

# **FINAL ENVIRONMENTAL IMPACT STATEMENT**

For the

Comprehensive Growth Management Plan

of Clark County,  
Battle Ground, Camas, La Center, Ridgefield,  
Vancouver, Washougal, and Yacolt.

**Comments on the DEIS with Responses**

**#1, received 03/31/2003 (undated) from Judy Birrer (representing herself),**

The recommended Comprehensive Plan as indicated in the FEIS does not specifically propose impacts to wetlands along 87<sup>th</sup> Avenue. Two previous City construction activities in the area, the construction of a force main near Burnt Bridge Creek and the construction of 87<sup>th</sup> Avenue did have wetlands impacts, but these were mitigated by additional wetlands enhancements off-site. Please note the response in Position Statement #3, Environment and Water Quality in the FEIS.

**#2, 04/07/2003, from David Haines (representing himself),**

Thank you for your comments regarding your property located near NW 169<sup>th</sup> St. and NW 61<sup>st</sup> Avenue. Please note that the proposed boundary expansion does not include this area and it is proposed to be retained as rural lands. A natural topographic boundary exists with Salmon Creek and that boundary is proposed for retention. When considering areas for expansion, the county looks first to designated Urban Reserve areas. Your property is not located in a designated Urban Reserve area.

**#3, 4/1/03, from Brent Davis, County wetlands biologist,**

Your comments suggested that Alternative three would be best in terms of urbanizing wetlands in the rural area. The Proposed Plan, shown in the FEIS, would impact fewer wetlands than Alternatives 1,4, and 5. The proposed plan would impact 447 acres, 254 of which is added to the Vancouver Urban Growth Area.

**#4, 3/20/03, from Dave Howe, County habitat biologist,**

You have listed three potentially troublesome areas from a habitat standpoint: the Whipple Creek basin, the Birtcher/Lacamas Creek basin and any proposed rezone of the Columbia River shoreline to industrial or commercial. You go on to state that of the five alternatives, Alts. 2 and 3 would best protect the network of resource areas in the county.

The Proposed Plan includes land use changes within each of these areas. With the benefit of the findings under Best Available Science and the upcoming critical areas ordinance updates, it is hoped that mitigations and regulatory protections will provide an adequate degree of protection in these urbanizing areas.

**#5, 04/10/2003, from Paul DeBoni, AICP, for Coastal Management Group,**

Thank you for submitting your letter alerting staff to the project-level environmental impact statement for the Green Mountain Project. Coordinating specific studies like yours with regional planning is very beneficial. There has not been the need for including your findings in the FEIS, however, because the proposed plan no longer includes the specific area.

**#6, received (undated) 04/15/2003, from Paul Ghitea Sr.**

Mr, Ghitea, Thank you for your comments on the metric system. They are noted, however, your concern is not a subject addressed by the FEIS.

**#7, 4/17/03 and 5/5/03, from Joel Rupley (representing the Clark County Endangered Species Program),**

1. Language in the DEIS for pp. 76, 78, 79 has been revised. Factual corrections have been made to threatened and endangered species lists in DEIS to reflect the status of Bull trout and sea-run cutthroat. Steigerwald Lake NWR has been added as suitable habitat for migratory birds.
2. The FEIS analysis reflects the current status of Salmon Creek watershed and the increased importance of Cedar Creek, East Fork Lewis River, and Washougal River to salmon recovery, as your letter described.
3. New “Suggested Mitigation Measures” have been added to the relevant FEIS elements of the environment. Mitigation measures in the form of best management practices (such as different setbacks, buffer widths), that could be implemented following the results of the new studies to protect the more valuable habitat have been added to the mitigation section for T&E habitat in the FEIS.



**#8 04/29/2003, from John Manix, P.E. PTOE, (representing himself). .**

The proposed Comprehensive Plan map has been selected. Elements of Alternatives 2 and 4 have been incorporated, some of which represent requests for land inclusion of the cities. Analysis of the impacts of the proposed plan are included in this FEIS document. With regard to your comment about the costs of residential development, there are mixed opinions in studies on the costs and revenues associated with new development. Information in the revenue analysis and Capital Facilities Plan on the proposed Comprehensive Plan may provide assistance to help you to determine whether your statement about the tax burden is accurate.

Clark County has added your name to our GMA Update mailing list, as you requested.

**#9, 05/05/2003, from Fred Suter (representing himself), .**

Please see the Environmental and Water Quality position statements in the FEIS document for responses to your concerns related to these issues. Policies for alternative transportation options can be reviewed in the Comprehensive Plan Policies document. Policies included in the proposed Comprehensive Plan document encourage efficient transit options as well as transportation demand management strategies. Light rail is not proposed as a specific high capacity transportation option, however, there are a variety of options that may produce a similar mitigation outcome. Your suggestions regarding the priority use of HOV lanes for alternative fuel vehicles is an interesting idea.

**#10, 05/05/2003, from Sam Kim & Les Wood (representing Greater Brush Prairie Neighborhood Association),**

Thank you for your comments on behalf of the Greater Brush Prairie Neighborhood Association. Expansion of the Urban Growth Area (UGA) boundary within the boundaries of your neighborhood association is not proposed at this time. There is a proposal for Industrial Urban Reserve to be applied extending on the east side of SR 503 for about one mile north of the existing Vancouver UGA and on the west side of about one-half mile north.

Mixed use is proposed to be applied to the Comprehensive Plan and zoning maps in selected areas within the Battle Ground UGA. Changes made in the Mixed Use, MX ordinance includes a table of allowed and conditional uses which was developed with input from a different neighborhood association with similar views as those of your association. Neighborhood associations routinely receive notice of applicable land use cases through the Development Services Division when development is proposed. Your association's participation in pre-application conferences and land use reviews is encouraged.

With regard to the Clark County railroad, the comprehensive plan does not directly address the role of the railway in your community. There are very small areas of the proposed Battle Ground expansion that are along the railway. These areas are not likely to be commercial or industrial in nature.

**#11, 05/04/2003 Don Kemper (representing himself)**

1. Tables 9, 10, and 11 in the DEIS contain the amount of stream (linear feet), including Salmon, Gee, and Whipple creeks, that would be included in UGAs by each of the alternatives and the amount of impervious surface included within new UGAs by watershed. Generally, those alternatives that include a larger amount of stream area and impervious surface can be expected to have a greater impact on surface water quality from stormwater runoff. This allows a planning level comparison of potential impacts between the alternatives. (WAC 197-11-442 *Contents of EIS on nonproject proposals* provides guidance on the level of detail required in planning level analyses.) See also responses to letter #7, comments 2 and 3.
2. Twenty-eight active monitoring stations in Clark County check parameters related to water quality, habitat, biota and hydrology. Clark Public Utilities (CPU) has an intergovernmental agreement with Clark County Public Works (PW) to do monitoring on Salmon Creek. CPU completed a Salmon Creek Watershed Assessment in October 2002 and a general Limiting Factors Analysis in August 2002. At the request of the BOCC, PW prepared a draft map of the Observed and Probable stream health for Clark County, with a report to follow. CPU is looking at East Fork, Cedar Creek and Yacolt Creek. The City of Vancouver Public Works will reinstitute water quality monitoring on Burnt Bridge Creek. Washington State University students have been doing some monitoring on all urban streams as well.
3. Mitigation is defined in WAC 197-11-768 as avoiding, minimizing, rectifying/repairing, reducing, eliminating, compensating, or monitoring environmental impacts. EISs are required to identify possible mitigation measures that will reduce or eliminate the adverse environmental impacts of a proposal. The FEIS summary table of mitigation measures has been updated to identify the intended environmental benefits of the stormwater regulations (mitigation measures (WAC 197-11-440(6)(c)(iv) and to identify unavoidable adverse impacts. Nonproject DEIS are not required to examine all conceivable policies or implementation measures but should cover a range of topics (see also response to #1, above, re: WAC 197-11-442). They should address an appropriate level of detail and impacts, and mitigation measures should match the level of detail. Typical or general impacts from stormwater runoff are discussed on page 56 of the DEIS. Typical or general mitigation measures are discussed in terms of implementing ordinances and comprehensive plan policies on pp 61-64 of the DEIS. An EIS is not required to evaluate mitigation in detail unless measures involve a substantial change to the proposal causing significant adverse impacts, or new information regarding significant impacts, and those measures will not be subsequently analyzed under SEPA. Decision-makers have the responsibility to judge if mitigation is likely to protect or enhance environmental quality (WAC 197-11-660, *Substantive Authority and mitigation*.) Site-specific proposals will be subject to additional SEPA project review, which provides an opportunity for additional mitigation when warranted by impacts. Additional mitigation that could be adopted is also proposed on p. 64.
4. Your comment is noted.

5. You are correct that project-level reviews do not typically reveal cumulative impacts. One of the purposes of nonproject EISs for comprehensive plans is to provide environmental review at the planning stage, to analyze impacts and determine mitigation system-wide, rather than project by project. This allows cumulative impacts to be identified and addressed where information to do so is available. The DEIS analysis of impacts of the proposed comprehensive plan is an analysis of expected system-wide additions of impervious surfaces with the assumption that less development is likely to have less impact than more. (New impervious surface projections were provided in the DEIS in Table 11, p. 57 and impacts on watersheds by potential percent coverage of impervious surface provided in Table 12 p. 58.) The Proposed Alternative analysis in the FEIS also looks at additional impervious surfaces that could be added. Additional mitigation measures have been suggested for minimizing cumulative impacts: development of low-impact development standards for critical areas along streams, pervious paving, and french drains to catch run-off and direct it to groundwater. Moratoriums on development due to traffic impacts are based on the concurrency requirements of GMA. The County has not adopted, and is not required by GMA to adopt, level of service standards for stormwater runoff.

6. Unfortunately, Clark County does not have current data, nor funds available to evaluate impacts through hydrologic system modeling based on the proposed growth and land uses under each alternative. WAC 197-11-080 provides for situations where there are gaps in information. Agencies are required to state that information is not available. A statement has been added to the FEIS indicating that such data is not available and would be cost prohibitive to produce. Agencies may proceed in the absence of information if the information is unknown and the costs of obtaining it are exorbitant. The costs of determining the revenues from all 5 alternatives and the Proposed Alternative would be prohibitive.

**#12, 5/5/03 Thom McConathy (of the Clark County Water Quality Resource Council)**

1. Your comments on the individual alternatives are noted.

**Comments on the DEIS**

2. As discussed in the DEIS (pp 61 and 70), several ordinances contribute to the protection of surface waters, including those regulating erosion, stormwater management, critical areas and water quality. The County's stormwater ordinance is designed to address both the infiltration/permeation of stormwater (for recharge purposes) and the quality of recharge water. The County's Critical Aquifer Recharge Area (CARA) ordinance is designed to protect groundwater from development that involves the use of materials that could result in contamination if mishandled. In addition, the GMA requires critical areas ordinances to incorporate "Best Available Science" for protecting those areas. The County's and cities' ordinances have been or will be updated to comply with the BAS requirement and will afford better protection than currently exists.
3. The County, as directed recently by the BOCC, is in the process of conducting a study to determine relative stream health county-wide. The results of the study should be available in early 2004. This will serve as a baseline for addressing the County's 303(d) listings.
4. Public transit is assumed in all alternatives. While high capacity transit and light rail options have been tested during this analysis, the full exploration of its feasibility and impacts will follow as part of a larger effort. C-TRAN has stated that 40 percent of their operating budget went away with the repeal of the motor vehicle excise tax. They are in the process of developing a 20-year plan in light of this budget hit. Light rail is considered part of the County's 20 year plan. It is part of the strategic Metropolitan Transportation Plan, and is in the City of Vancouver's Plans as well. There remains a good deal of work in order to secure funding for High Capacity transit.
5. As noted above, the County has regulations to protect groundwater. The County's Health Department as a public health issue regulates water quality in private wells. The county recently amended the sanitary sewer ordinance (CCC 13.08A) to prohibit new septic systems in UGAs, in part to address the problem you mention.
6. The County has recently received 2-foot elevation contour data for much of the lowland area of the county. One application of this data will be in updating the county floodplain maps, a process that will probably start next year as the County looks to update all its critical areas ordinances.
7. The ESA Program Office is developing a template that could be applied on a watershed basis. This is being considered as a tool for restoring habitat and recovering listed species. It will be helpful in acknowledging that the watersheds in the county differ—with streams having different functions and values—and they may benefit from restoration or protection measures designed to fit their particular profile.,

8. Policies to protect groundwater are included in Chapter 4 Environmental Element of the comprehensive plan text. The comprehensive plan policies are implemented through the ordinances discussed in the response to #2, above.

**Comments on the Draft Comprehensive Plan text**

9. The county has policies about annexation, one of which is a requirement for an interlocal agreement with cities who are planning to annex property in the near future. Annexation policies were recently thrown out by a Washington Supreme Court decision declaring that the standard method was unconstitutional. It will take new legislation from the state to correct this problem. The City of Vancouver prepared an annexation blueprint (updated in 1997) to set priorities for areas annexed to the City. The City will update the annexation blueprint following final adoption of the Vancouver UGA.

10. GMA requires that only urban areas should have urban levels of services and development. The updated comprehensive plan contains the same policy language (Policies 1.2.1 and 1.2.2) as in the current comprehensive plan (Policies 2.1.1. and 2.1.2)

11. The county is not abandoning resource lands. The proposed expansion of urban growth areas includes 2,953 acres of resource land, of which 195 acres is designated mineral land and the remainder is agricultural land. This is less conversion of resource land than under Alternatives 1, 4, and 5. This is consistent with the mandate by the GMA to protect resource lands for resource uses. Some development has occurred on resource lands, but much of this development supports resource uses and is otherwise consistent with allowable uses in the county code. The county has 'right to farm' and 'right to log' policies that are not changing, and one of the criteria for picking a preferred alternative was to minimize the conversion of resource lands. Conversion of resource lands is discussed in the DEIS and FEIS.

12. Rural centers are historic nodes in the county where development activity has occurred at a density between urban and rural densities. These centers developed to support resource activities. Less than 20 percent of growth in the county has gone to rural Clark County, but it has gone there and will continue to do so. Five-, ten-, and twenty-acre minimums have been applied to rural non-resource property. Rural center designations have a one-acre minimum. The best chance for containing conversion of rural lands is to expand rural centers, as long as water and septic systems can safely handle the increase.

13. This is a budgetary issue. Historically, Parks has had the money to acquire property for new parks but has not had the money to develop and maintain the parks.

14. (see note at #5)

15. The Clark County Health Department under authority from the Department of Ecology permits private water well construction. Under GMA, there has to be a certification of potable water before an occupancy permit is issued. Likewise, septic

systems are permitted by the health department which requires a successful percolation test on the parcel. There is also a minimum lot size requirement for septic systems, and as stated earlier, no new septic systems are allowed in UGAs.

16. (see note at #13)

17. (see note at #9)

18. (see note at #15)

19. Watershed councils are certainly an option for managing watersheds in Clark County, given that the work of the ESA Program Office is focused on watersheds.. Perhaps a proposal from the Clark County Water Quality Resource Council would be appropriate

20. (see note at #15)

21. You are mostly correct about the success of wetland banks—many that are established have not worked in the long run. Wetland banks can work if the concept is approached correctly and cautiously, and with the cooperation of all interested parties. There is some interest in the county of at least exploring the possibility of developing a wetland bank here.

22. The county's Shoreline Master Plan is in need of updating. DOE is in the process of adopting some long-awaited final guidelines for shoreline plans. Updating the plan will, however, be an expensive undertaking, and will require state funds to do.

23. The information on air resources in the Environmental Element was provided by SWCAA. We believe that air quality is adequately accounted for in the comprehensive plan update.



**#13, 05/05/2003, from Ole Rasmussen (representing himself),**

Please refer to the position paper on the Discovery Corridor in this FEIS document. The proposed Comprehensive Plan Map is based on a modified Alternatives 2 and 4. The County has designated significant amounts of land for jobs, including business park, office campus and mixed use, which should supply a variety of types of employment within the UGA. The comment regarding use of natural boundaries is relevant and where prudent, we have used such natural features. Further review of the expansion areas by the Board of Commissioners may result in consideration of boundary adjustments consistent with natural topographic features.

**#14, 05/05/2003, from James Howsley (representing Lane, Powell, Spears, Lubersky LLP),**

Please refer to the growth rate position paper herein. The Board of Commissioners has recommended a growth rate of 1.83 percent, which is the medium level given to the county by the Office of Financial Management.

With regard to underutilized lands, the methodology used for vacant and underutilized lands includes a generous factor for infrastructure that is consistent with that found in a sample of selected sites. This includes recorded easements. The range selected by the Board of Commissioners for infrastructure is between 25 and 27.5%, depending on land use category.

**#15, 05/05/2003, from Alison & Richard Strobel (representing themselves),**

Land uses designated around the Pleasant Valley Neighborhood are Urban Low Density Single Family (R1-7.5), Business Park (BP) and a small amount of Commercial. There is also some Mixed Use (MX) area further to the southeast, along the 72<sup>nd</sup> Avenue corridor. Additional industrial and commercial designated land is located adjacent to arterials and Interstate 5.

Land use designations in the area guide the type of development allowed. In the cases of Mixed Use, Business Park and Office Campus, the county has drafted new code language that limits uses and provides some design standards to facilitate compatibility with surrounding residential uses.

**#16 05/05/2003 La Center City Council (representing the City of La Center)**

Your letter states that no alternative adequately reflects the City's objectives. Staff notes that Alternative 4 includes all proposed changes to urban growth boundaries submitted by the cities as of August, 2002 when the DEIS work began in earnest. La Center's proposed expansion areas are incorporated in the Proposed Comprehensive Plan Map.

Your letter notes that La Center's vision includes more opportunities for economic development, preservation of community character and a 2023 population of 3,500. Staff's analysis based on the Vacant & Buildable Lands Model indicates that there is residential capacity for 1,594 additional people within the existing La Center UGA and another 188 population in the expansion area shown on the Proposed Comprehensive Plan Map. When added to the current population (2,017) the potential population of La Center in 2023 is 3,799.

Your letter requests that the preferred alternative add 64 net acres to the UGA along North Fork Rd. The Proposed Comprehensive Plan Map includes this area in the La Center UGA. The City advocates a policy mandating a sub-area plan for the area from La Center Junction to Ridgefield Junction, between 10<sup>th</sup> and 31<sup>st</sup> Avenues to be adopted before the next Plan update. The Board of County Commissioners share your interest in the proper planing of these areas, and a sub area plan may be initiated in the future. In the interim, the City proposes that an industrial reserve overlay be placed on this area and new policies adopted limiting parcelization into lots smaller than 20 acres. There are no specific policies mandating a sub-area plan for the area from La Center Junction to Ridgefield Junction, nor are these areas proposed for urban development within the 20 year planning horizon. The Proposed Comprehensive Plan Map designates a large area around La Center Junction and north of the Ridgefield UGA as industrial urban reserve. This designation limits parcelization to lots of 20 acres or larger. Though the Board of County Commissioners may be looking into this matter.

The City notes that it will object to any future designation of La Center Junction as a Floating Industrial Zone or rural industrial land bank. The Proposed Comprehensive Plan Map includes no proposal for designating this area as a Floating Industrial Zone or rural industrial land bank

**Specific Comments on the DEIS:**

1. Your comments are noted. The proposed alternative submitted by La Center was reflected on the modified Alternative 4 map considered by the Board during the selection of the preferred alternative.
2. A reference to your description of La Center's public involvement process has been added to the amended DEIS.
3. Suggested changes to Chapters IV, V and VII have been made in the amended DEIS. Table 64 did not reflect any multi-family units because the formulas used in the analysis

did not recognize the specific provisions in La Center's low density residential districts that allow multi-family housing under certain circumstances.

Table 67 has been updated in the amended DEIS. Your comment on transportation costs is noted. A complete project list is included with the FEIS. Figure 2 has been corrected and can be found in the FEIS. Fig 3, Alternative 1 was intended to represent a continuation of the growth assumptions and policies adopted in the 1994 Plan through the year 2023. As such, the 'cherry stem' is shown simply to illustrate a theoretical expansion to the La Center Junction that is connected to the existing UGA. There is no difference in the analysis. The Board did not adopt Alternative 1.

4. Information on planned wastewater treatment capacity has been added to the amended DEIS.

5. The County is proposing an industrial urban reserve overlay at the La Center Junction. There is no proposal at this time to designate this area as either a Major Industrial development pursuant to RCW 36.70A.365 or a Master planned development pursuant to RCW 36.70A.367. The County has developed an agreement with the Cowlitz Tribe with regard to their potential site development.

6. Subarea planning is a necessary and valuable process prior to the urbanization of an area. Since the Proposed Comprehensive Plan Map does not advance the same land use pattern as Alternative 5 — The Discovery Corridor — and does not include the area described into the urban growth boundary of any city, it would be premature to invest in subarea planning at this time. Two large areas are proposed for protection as industrial urban reserve, one surrounding the La Center Junction and one north of the Ridgefield UGA adjacent to I-5. The existing UR-20 Urban Reserve District includes provisions that restrict parcelization of these lands into lots smaller than 20 acres. County staff proposes to increase the minimum lot size to 40 acres in a code revision being advanced in conjunction with the Comprehensive Plan update.

**#17 05/05/2003 Randy Bombardier (representing the City of Ridgefield)**

No alternative adequately reflects the City's objectives. Several comments and corrections are provided in a footnote. Please refer to comments under #16 above.

The letter states that the City will accommodate 450 – 900 dwelling units through the EMUO district and does not need more low density land as in Alternatives 1 & 2. No additional residential lands are added in the Proposed Comprehensive Plan Map. Your letter further states that Alternatives 3 & 4 do not reflect the City's desire to accommodate more multi-family residential and employment growth. However, no additional multi-family residential and employment lands were proposed by the City prior to the preparation of the Draft EIS. The letter contends that Alternative 5 could allow urbanization of lands outside of any UGA in conflict with the intent of GMA. The Proposed Comprehensive Plan Map does not include any expansion that would allow urbanization of lands outside of urban growth areas. Please refer to discussion under the position statement on the Discovery Corridor above.

Ridgefield's preferred alternative as stated in this letter includes the expansion of the UGA to take in eleven specific sites plus the addition of two sites to the Industrial Reserve area. A 49.84 acre parcel on the south side of Hillhurst Rd. was added to the UGA and designated Public Facilities per Ridgefield's request. The Board of County Commissioners elected not to include other proposed expansion areas and industrial reserves because there are adequate vacant and buildable employment lands within the Ridgefield UGA and sufficient industrial reserve areas already designated to accommodate the City's likely job growth.

The City advocates a policy mandating a sub-area plan for the area from La Center Junction to Ridgefield Junction, between 10<sup>th</sup> and 31<sup>st</sup> Avenues to be adopted before the next Plan update. Please refer to comments under #16 above. The City notes that it will object to designation of La Center Junction as a Floating Industrial Zone (rural industrial land bank). Please refer to comments under #16 above.

Specific Comments on the DEIS:

1. The proposed alternative submitted by Ridgefield was reflected on the modified Alternative 4 map considered by the Board during the selection of the preferred alternative.
2. Response to bulleted comments:
  - The public can ascertain 2023 population from Table 1 by adding "additional" population to projected additional population figures.
  - With respect to impervious surfaces in Table 12, Alternative 2 does expand the UGA for Ridgefield for Urban Low Density residential districts. Impacts on Gee Creek as a result of that expansion were based on data provided by Clark County GIS, which was the best available information at the time of preparation of the DEIS.
  - With respect to wetland and stream impacts by jurisdictions, your comment is noted. GIS did not generate more specific information. However, the system-wide impacts

can be compared. A non-project EIS is not required to identify site-specific Fish & Wildlife impacts. Mapping habitats in specific stream sections and in wetlands is difficult due to the lack of detail on the available maps.

- The DEIS, p. 95, states that under Alternative 4 the Ridgefield UGA would not expand.
- A complete project list has been included in the FEIS.
- Figure 20 cannot be corrected because there is no data available on water tables and infiltration areas for the north part of the County.

3. The Proposed Alternative does not extend Ridgefield's UGA east of I-5.

4. Subarea planning is a necessary and valuable process prior to the urbanization of an area. Since the Proposed Comprehensive Plan Map does not advance the same land use pattern as Alternative 5 — The Discovery Corridor — and does not include the area described into the urban growth boundary of any city, it would be premature to invest in subarea planning at this time. Two large areas are proposed for protection as industrial urban reserve, one surrounding the La Center Junction and one north of the Ridgefield UGA adjacent to I-5. The existing UR-20 Urban Reserve District includes provisions that restrict parcelization of these lands into lots smaller than 20 acres. County staff proposes to increase the minimum lot size to 40 acres in a code revision being advanced in conjunction with the Comprehensive Plan update.

**#18 05/02/2003 Dennis Osborn (representing the City of Battle Ground)**

In your letter, the City asserts that Alternative 3 is not realistic because growth will occur despite the growth rate set by the County. The Board of County Commissioners subsequently raised the rate from 1.5 to 1.83 for the proposed plan. For discussion of the revised growth rate, please refer to the position statement on the 1.83% annualized growth rate. County staff also notes that Alternative 3 did not preclude growth, but channeled it into the existing urban growth areas. It is not clear how significant amounts of growth would occur outside of existing UGAs, as implied by this comment, given the limited uses and densities allowed under rural zoning.

The City's letter also states that Alternative 5 should be dismissed from further consideration due to conflicts with the GMA including RCW 36.70A.010 (1) & (2) and RCW 36.70A.365. Please refer to the Discovery Corridor position statement above.

You note that of the remaining three alternatives, Alternative 4 provides the most jobs and industrial land. It has the lowest transportation cost and second lowest water and sewer costs. Alternative 4 also ranks second in acres of affected environmental lands. The point of these observations is that the preferred alternative must factor the Draft EIS data while balancing GMA requirements. From the City's perspective, Alternative 4 meets this goal. County staff notes that there are a variety of ways to balance GMA requirements and environmental criteria. The Proposed Comprehensive Plan Map differs from Alternative 4 primarily in that areas adjacent to Salmon Creek and the East Fork of the Lewis River are not included in the Battle Ground UGA. A reasonable case can be made that this proposal strikes a better balance between necessary growth and environmental impacts.

It was also noted that the widening of 219<sup>th</sup> from I-5 to the City limits is now funded by the recent gas tax hike. This project will be reflected in the 6 year Capital Facilities Plan and the regional transportation model.



**#19, 4/29/03, from Richard Kennon (representing the Native Fish Society),**

The NFS believes that a workable alternative could be formed from Alts. 2, 3 and 5. They believe Alt. 4 allows cities to expand into critical areas, with the example used of Battle Ground wanting to expand northward to the East Fork. It's believed that this will harm critical wetlands, springs and creeks and aquifers that protect the East Fork. The Proposed Plan does marry together Alternatives 2, and 5. Additionally, in the Proposed Plan the Battle Ground expansion northward was reduced specifically to protect the Easy Fork of the Lewis River.

The letter also noted the impacts of the high growth rate in alternative one. This growth rate, 1.83 annualized, was selected for use in the proposed alternative. However, it was balanced by the selection of other numerical drivers of the urban area expansion which reduce the amount of needed urban lands. Specifically, the proposed plan was crafted using updated infrastructure numbers, employment densities, and persons per household. The artificial residential "market factor" which automatically increased boundary expansions was eliminated. Additional information can be gleaned from the Position Statement on the growth rate and on the environment.

**#20, 05/05/03, from Jerry Olson (representing Olson Engineering),**

A primary concern in your comments was the adequacy of a 1.5% growth rate. Please refer to the position statement on the 1.83 annualized growth rate. The Board of County Commissioners did raise the rate from 1.5 to 1.83 for the proposed plan. You had also suggested that the previous 19% allocation of household growth to the rural area was too high. You suggested the use of 13%. The BOCC decided to proceed in the Plan update with only 10% of the population allocated to the rural area.

Your request for a reconsideration of redevelopment assumptions has also been considered. The assumptions that regulate the amounts of land have been the matter of great debate. The proposed plan, which was melded from the alternatives, has many changed assumptions from 1994. It may also be possible that the vacant land model assumptions be more broadly reconsidered after adoption of the plan.

**#21, 05/05/03, from Michael Clark (representing WADOT),**

One of the concerns raised in your letter was about inconsistency between Metro and Clark County forecasting assumptions. There are inconsistencies which are largely driven by observed differences in the nature of urban development in different counties of the metropolitan area. There are also inconsistencies that have arisen because of purposeful decisions made by Clark County. For example, the capture rate for new jobs is envisioned higher for Clark County *in* Clark County. This is both because of specific policy decisions made in Clark County, and because certain assumptions (used by Clark County as policy *inputs*) are *outputs* of the MetroScope model. However, there have been efforts made by all parties for better coordination between Metro and Clark County. Concurrent with this Plan update, Clark County staff will be providing land use plans for inclusion in and consideration by the Metro modeling staff.

The proposed mitigation from your letter were taken very seriously. These will be found in the revised lists of mitigation in the EIS. Specifically, there seems to be value in greater reliance on interchange access plans and corridor management plans. As SR 503 will be the focus of some debate, staff will consider the suggestion of an alternate frontage-type road. In other areas, as your letter has suggested, staff will draft additions to the arterial system for areas too reliant upon state facilities.

**#22, 4/03 Gretchen Starke (representing the Vancouver Audubon Society (VAS))**

1. WAC 197-11-430 through 440, and –442 provide rules for EIS formats. No indexes are required. EISs for nonproject proposals are allowed greater flexibility in their format. The EIS tables of contents has been expanded to four levels for additional page references.
2. DEIS (pp. 72-74) lists priority habitats found in Clark County by type and specific location as identified by WDFW. Brief descriptions and the importance of each habitat type are offered. Per WAC 197-11-440, this part of the DEIS succinctly describes the principal features of the environment (priority habitats) that would be impacted by the alternatives. Inventory lists of species other than rare, threatened, and endangered are discouraged by SEPA. Your request for tracking of indicator species is noted. The DEIS states that “growth patterns that convert more land to urban uses are more likely to result in the loss and fragmentation of fish and wildlife habitat.” Generally, those alternatives that convert a larger area to urban uses will result in greater fragmentation of wildlife habitat. Assessing the exact degree and nature of fragmentation that would result from each of the alternatives is beyond the level of detail appropriate for nonproject, planning level EISs. We simply do not know what the development pattern will eventually look like.
3. A brief description of methodology for Clark County, state mapping efforts is provided in Existing Conditions section (DEIS, pp. 72-73) and is deemed a sufficient explanation by lead agency. It is not within scope of the EIS to provide information to allow public to determine adequacy of state and local mapping efforts. You may wish to review the proposed new Chapter 4 of the County’s revised comprehensive plan. It contains policies and implementation strategies relating to mapping.
4. Your information has been noted.
5. The description of Tier 2 habitat is considered sufficient for analysis in this EIS.
6. Your comments on mapping are acknowledged. Maps of priority habitats for anything other than Fish & Wildlife conservation areas were not available for inclusion in the DEIS.
7. Your comments are noted.
8. Your comments are noted. At present, Clark County does not have the resources to map, monitor, or evaluate species and habitats as you suggest.
9. Clark County does not have the resources to estimate the loss of priority habitat under each alternative and there are currently inconsistencies in data between Clark County GIS and WDFW maps that would make acreage calculations unhelpful. The Summary of Impacts (Table 2 in the DEIS, p. 9) compares alternatives on salmon-bearing streams and the numbers of T&E species found in new UGAs. This is sufficient for planning level

analysis, given Clark County's mapping limitations. See response to Kemper, comment letter #11, response #6 regarding adequacy of information for EISs in the WAC. Location-specific information on Threatened & Endangered species is generally considered confidential in order to protect the resource. The WDFW maps that were used were hard copies only. Fish and wildlife conservation areas provide protections to those designated habitats under current regulations, though as you point out, fragmentation of habitat that is not protected by conservation areas can result in unavoidable loss of habitat.

10. Lists of ordinances by jurisdiction are in the DEIS, pp 76-78.

11. The DEIS is not required to evaluate effectiveness of mitigation proposed in this case. See responses to Kemper, comment letter #11, response #3 for obligations under SEPA. However, it is important to note that current ordinances were drafted principally to comply with the requirements of GMA. The County is in the process of obtaining compliance with the ESA through the County's Endangered Species Program. Part of that effort is reviewing all of the existing ordinances to ensure that the county's ordinances respond to statutory mandates surrounding environmental issues. The County's 4(d) Compliance Work Plan (available through the County's website) includes reviewing three basins in the county to develop a baseline survey of the biological health of fish in these basins. This information will help the county determine how its ordinances will impact salmon as the county grows and development continues. For more information about the county's response to the 4(d) rule, contact Joel Rupley at the Clark County Endangered Species Program, (360)397-2022. The DEIS did not explicitly discuss the intention of the regulations as mitigation and did call out the potential limitations of existing wetland, shoreline, and critical areas ordinances. The FEIS summary will call these out more clearly.

12. GMA requires protection of critical habitats. Current regulations and ongoing efforts to update the ordinance(s) based on best available science (BAS) will provide an increased level of protection. Washington State Department of Ecology will review the updated ordinance(s), thereby providing additional assurances that the regulations will meet state and federal requirements. There are not sufficient resources to fully evaluate the effectiveness of the mitigation for this EIS in the ways that you suggest. See response #11 for review of ordinances for ESA compliance, and Kemper, comment letter #11, response #3 for a discussion of SEPA requirements for mitigation measures.

13. Your comments are noted. As discussed above, revisions to the ordinances that collectively help to protect habitats will be occurring over the next 18 months.

14. See response to #11, above and the County's website at <http://www.co.clark.wa.us/site/esa4/clarkco.htm>.

15. The DEIS could have been more explicit about any existing uncertainties of mitigation measures although unavoidable impacts are discussed in the impacts sections for the elements of the environment. The FEIS is more explicit.

16. Your comments are noted. Pacific Lamprey does not have legal “sensitive” status at this time in Washington. The Gray wolf is listed as federally “threatened” in Washington, but none are known to exist in southwest Washington. The text in the amended DEIS reflects this information.

17. Your comments are noted. Please refer to discussion under comment #9.

18. The DEIS did include discussion of unavoidable adverse impacts, integrated with the discussion of impacts in general for each element of the environment and under each alternative where applicable. SEPA’s central provision for EIS content is codified in RCW 43.21C.030(c). In Subsection (v) it requires coverage of “any irreversible and irretrievable commitments of resources which would be involved in the proposed action should it be implemented.” The SEPA Rules at WAC 197-11-440(6)(d)(iii) suggest that this be done under a summary of significant adverse impacts that cannot or will not be mitigated. No reported case has directly addressed either the statutory or regulatory provisions. SEPA rules do not suggest separate treatment of irrevocable resource loss; they can be integrated, as appropriate, with discussion of the environmental impacts and mitigating effects of the proposal and various alternatives. The DEIS summary section did not specifically call out unavoidable adverse impacts. The FEIS summary section is more explicit in discussing these issues.

19. NEPA regulations (upon which SEPA was based) used to require or encourage evaluations of worst case scenarios. Current thinking on environmental review at the federal level has moved away from this type of evaluation towards analysis of a reasonable range of alternatives. The range of alternatives in the DEIS for the most part “bracket” the Proposed Alternative (that is, some would have more impacts and some less) and addresses most of the impacts on wildlife and habitat with the exception of a few geographical areas, and changes to proposed comprehensive plan designations. Those areas are addressed in the FEIS.

20. SEPA does not require the selection of a preferred alternative, although a preferred alternative can be chosen at any point in the EIS process. While choosing a preferred alternative can have the advantage of making clear which alternative is best or most likely to be approved, it can also have the disadvantage of making it seem as though a decision has already been made. The County elected to use the DEIS in the decision-making process to determine a preferred alternative, now identified as the Proposed Alternative. EISs are not intended to be the only document used in agency decision-making.

21. Your comments on alternatives are noted. Your suggestions for mitigation have been added to the FEIS under “suggested mitigation measures”.

22. The Proposed Alternative does not extend the Battle Ground UGA to the East Fork Lewis River nor to Salmon Creek.

**#23, 05/02/2003, from Michael C. Worthy, William J. Firstenburg, & Pat Sheaffer (representing Bank of Clark County, First Independent Bank, and Riverview Community Bank),**

Thank you for the report you submitted from the Washington Center for Real Estate Research regarding the economic impact of homebuilding in Clark County. The proposed Comprehensive Plan includes the required acreage of residential land inside the existing urban growth areas and in the proposed expansion areas so that homebuilding will still be a viable economic activity in Clark County. The amount required is based upon observed and adopted development findings from densities to infrastructure reductions. Please refer the to analysis of capacity in the FEIS.

**#24, 05/05/2003, from Patricia F. Price, President and William E. Moyer, Vice President (representing Pleasant Highlands Neighborhood Association).**

Ms. Price and Mr. Moyer, thank you for your comments on behalf of Pleasant Highlands Neighborhood Association. Please refer to the position papers on the environment and job creation for responses to some of your concerns

The proposed Comprehensive Plan takes into account the existing land uses in the Pleasant Highlands Neighborhood Association boundaries. You stated that the vote of the membership of the neighborhood association was for Alternatives 3 and 2, respectively. Staff points out that a combination of Alternatives 2 and 4 were selected for the proposed Comprehensive Plan map by the Board of Commissioners. Please note that the area proposed for expansion in your neighborhood association boundaries was considerably scaled back from that in some of the alternatives and essentially includes the section immediately north and east of the intersection of NE 119<sup>th</sup> Street and 50<sup>th</sup> Avenue. Areas north of 139<sup>th</sup> Street were kept in Urban Reserve and not included in the proposed boundary expansion. Zoning proposed for the residential areas are for R-12 to R-22 at the intersection of NE 119<sup>th</sup> Street and 50<sup>th</sup> Avenue, then scaled back to R1-7.5 in the NE corner of the section. Commercial zoning is proposed directly at the intersection. Employment Center zoning is proposed to be located off of NE 50<sup>th</sup> Avenue on the east side about one-half mile north of 119<sup>th</sup> Street.

The proposed codes for business parks and Office Campuses should assuage many of your concerns. The code includes landscaping requirements and design standards which will produce more neighborhood compatible sites than previously allowed. There have also been discussions about building heights and nuisance language that are specifically intended to improve the “fit” of these developments. The uses within these areas will be seriously reduced from those of the previous light industrial category.

Transportation impacts have been analyzed for major corridors. The results will be available in this FEIS, and will be available well before for the Planning Commission public hearings upcoming in September, 2003.

With respect to your request for a 90 day review period after issuance of the FEIS, the County is on a set schedule for adoption and we are unfortunately unable to accommodate a 90 review period.



**# 25 05/05/2003 Lynda David (representing the Regional Transportation Council)**

Your letter notes that the County and cities will need to submit the transportation elements of their updated Comprehensive Growth Management Plans to RTC for certification of compliance with relevant provisions of GMA and HB1487, the “LOS Bill”. The County intends to submit the required documents.

The first general comment cited the need to coordinate growth forecasts for the Portland – Vancouver region. Consistency is critical given the impact on I-5 Corridor DEIS work which is getting underway. Staff agrees and has coordinated closely with RTC through RTAC meetings, the Comprehensive Plan Review TAC, Board participation on the Regional Transportation Council and discussions with RTC staff to ensure regional and metropolitan area consistency with respect to population growth and traffic volume forecasts. For discussion of the population growth rate consistency with regional forecasts, please refer to the position statement on the 1.83% growth rate. County staff supports RTC’s efforts to assure that consistent growth assumptions are used in the Metropolitan Transportation Plan for Clark County, the Washington Transportation Plan and other transportation studies conducted in the region.

The second general comment was that comparisons between alternatives can be misleading due to the varied demographic and growth assumptions. Staff agrees that comparisons were more difficult with the methodology used, however we believe that the analysis offered a broad range of growth scenarios for the public and elected officials to consider. We analyzed the full build out of urban areas in order to accurately assess the future capital facilities demands. Allocating a fixed number of households and jobs, while convenient for comparison purposes, has the potential to dramatically underestimate the growth potential affecting a sub-area or corridor. It also fails to account for the dynamic relationship between land supply and demand.

The third general comment addressed the need to be explicit when referring to employment numbers, because they could represent wage and salaried jobs (which are often the basis for land consumption and employment density analysis) or total jobs as defined by the Bureau of Economic Analysis (which are typically used in travel demand forecasting). Staff has tried to make that distinction in workshops with the Board of County Commissioners and in the DEIS. For UGA sizing, the wage and salaried job numbers were used. When determining future employment within each Transportation Analysis Zone, employment numbers were increased by a factor of 1.34 to reflect the observed ratio of covered to total employment.

The fourth general comment refers to the Countywide Planning Policy which supports development of a “balanced transportation system” and asserts that land uses and design standards should be supportive of transit and of development of a walkable community. While land uses and design standards are not directly within the purview of RTC, staff agrees that they are critical to the success of transit service and that the Growth Management Act requires that zoning designations and standards be adopted which implement the Countywide Planning policies. Review of the Comprehensive Plan for

internal consistency and policy implementation is occurring as part of the Plan update process.

The fifth general comment advises that reference to HB 1487 should include the term “LOS Bill”, since Bill numbers may be reused in future sessions. Staff concurs. In addition, it is noted that pursuant to this Bill, Clark County must address the traffic impacts to state-owned transportation facilities resulting from the Plan update. The County will incorporate the adopted levels of service for Highways of Statewide Significance and regional state highway facilities in the transportation element. The Plan will address impacts to these state-owned facilities in accordance with state law.

The six general comment noted that none of the alternatives studied allows for any of the major transportation projects to be deleted from the Metropolitan Transportation Plan list of transportation needs. No major projects are proposed for deletion in the DEIS.

The specific DEIS comments:

1. 115,762 new residents includes all new residents in urban and rural areas whereas 38,587 new urban households refers to new households needed to accommodate the population assumed to live in urban areas. The DEIS assumed 81 percent of new residents would live in urban areas, totaling 93,767 new people. Assuming an average household size of 2.43, 38,587 new households would be needed in urban areas. Rural areas were assumed to accommodate 19 percent of additional population, totaling 21,995 residents. Assuming a 2.43 average household size, 9,051 new units would be required in rural areas. Countywide (urban and rural), projected new population: 115,762; new housing units: 47,638. Average household size 2.43

2. The Proposed Alternative is designed to provide sufficient industrial and commercial land to attract more jobs to Clark County. It would provide less residential land than Alternatives 1, 2, and 5, which should improve the balance of jobs to residents. In addition to providing a suitable land supply, the County can choose to focus capital investment in some select areas to provide needed infrastructure improvements in advance of development to attract industry. Experience shows that the market responds well to “shovel ready” sites at which development can begin as soon as plans and approvals are completed.

3. Your comment is noted.

4. Your comment is noted.

5. Your comment is noted. Table 5, Non-Procedural Amendments to the Growth Management Act, 1995-2001 on p. 23 of the DEIS cites the amendment to RCW 36.70A.070 (Comprehensive plans – Mandatory elements) that requires level of service standards for state highways in local comprehensive plans. A sentence has also been added to the amended DEIS as indicated in your comment and the references to HB 1487 have been changed to “LOS bill”.

6. The Preferred Alternative uses a 2.69 average household size .
7. The text has been changed in the amended DEIS.
8. The text has been changed in the amended DEIS.
9. A caveat has been added to the text of the amended DEIS.
10. A note has been added to Table 53 in the amended DEIS.
11. Your comment is noted and a note added to Table 54 in the amended DEIS.
12. The text in the amended DEIS has been revised to reflect your comment.
13. Your comment is noted.
14. Your comment has been added to the text of the amended DEIS.
15. Your comment has been added to the text of the amended DEIS.

**#26, 05/05/2003 Royce E. Pollard (representing the City of Vancouver)**

1. The first page of your letter notes that all of the proposed boundary expansions are too large. The DEIS discloses the difference between planned and total capacity in Tables 23, 24, and 48. The major reasons for these differences are inclusion of a market factor and use of assumptions about development patterns that differ from those in the Plan Monitoring Report (2002). Your preference for a modest expansion is noted. Although none of the alternatives exactly reflect the City's requested UGA expansion, SEPA requires an evaluation of a range alternatives, including a "No Action" alternative. Alternatives should reflect a range of options that are reasonable and can attain the project's or program's objective. In this case, the action alternatives (2, 4, and 5) were designed to reflect County and city preferences, redressing the imbalance of jobs-to-population in the county, and also accommodating projected growth in population and employment as required by GMA.
2. You state that the proposed alternatives use outdated development assumptions that overstate land needs. The key development assumptions used to develop the five alternatives were chosen by the Board of County Commissioners through a public process: the 1.5 percent growth rate, use of the market factor, and projected housing and employment densities. Some of the assumptions for the alternatives reflect observed experience (e.g., Alternative 2's employment growth rate, infrastructure factor in Alternative 3) and some reflect policy decisions by the BOCC (1994 population growth rate in Alternative 1, market factors). Your comments on the capacity evaluations in tables 23 and 49 are noted. The capacity of the Proposed Alternative is provided in the FEIS.
3. Your comments on inefficient development being costly are noted. Consistency of the Proposed Alternative with the Community Framework Plan and GMA is addressed in the FEIS. Your reference to the potential of UGA expansions with excess capacity encouraging leapfrog development is noted. This potential impact has been added to the discussion of land use impacts in the FEIS. The Proposed Alternative identifies urban reserves for future development beyond the 20-year planning horizon.
4. Your comments on the desirability of a balance of jobs, housing, and services are noted. The Proposed Alternative is intended to improve the jobs-to-population ratio over the long term.
5. Your comments on the impacts of urbanization are noted. Please find concurrence with your assessment of impacts on pp. 56-60 of the DEIS. Unavoidable adverse impacts ("ordinances can realistically reduce but not eliminate impacts from urbanization") have been added to the Summary section of the FEIS.
6. The City's analysis of 3A has been added to the DEIS. Alternative 3A is also included in the transportation analysis in the FEIS.

7. Since the comment letter was submitted, the cities of Camas and Vancouver have reached agreement on their shared UGA boundary. The agreement was used to determine the land uses in the Fisher Basin area. The other expansion areas proposed for the VUGA were added to provide the necessary 20-year supply of urban land. The County's estimations of how much new land is needed arises from the use of different development assumptions.

8. The Proposed Alternative evaluated in the FEIS includes a larger boundary expansion than requested to the north of the current Vancouver UGA as well as additional areas designated as urban reserve.

9. Your comments are noted.

10. See response to comment #2.

11. Your comment about the low efficiency rankings of the Discovery Corridor and Battle Ground Focused Public Investment Areas is noted.

12. See response to comment #3.

13. Your comment is noted. Consistency of the Proposed Alternative with GMA and the policies of the Community Framework Plan are discussed in the FEIS.

14. Your comments are noted.

**#27, 05/03/2003 David Gilroy (representing himself and possibly Mill Creek Forest Homeowner's Association)**

1. Your comments are noted.
2. Your comments on existing and potential impacts of development in the areas around Salmon and Mill creeks are noted. Your comments relate to specific locations that may provide evidence of typical impacts and suggest system-wide mitigation measures, but location-specific remediation is not required and not included in the DEIS. Please refer to responses to Kemper, comment letter #11 regarding ongoing efforts to study hydrology and water quality issues in the county and the level of analysis required for the DEIS.
2. Your comments on the alternatives are noted. Potential impacts from the Proposed Alternative on Salmon and Mill creeks are presented in the FEIS.
3. Hazel Dell Sewer District has received the information on the damaged sewer trunk line. According to the District, the condition of the line does not impact the system. Since the line may not be extended due to nearby environmental constraints, Hazel Dell Sewer District does not plan to repair it in the near term. The Proposed Alternative would create Urban Reserve north of the location you have indicated in your letter and therefore would not propose to develop that area until the latter half of the 20-year planning horizon.
4. Your observation of bird species in your area is noted. The Bald eagle is a listed Threatened and Endangered species in Clark County, as shown in Table 19 of the DEIS.

**#28, 05/05/2003, from John McKibben (representing the Chamber of Commerce),**

The Chamber recommends an increasing focus on job development. The Board of County Commissioners, and the staff could not agree more. Please refer to the position statement on job creation. The Chamber suggested the goal of one job for every 2 residents. If this is based upon new residents (160,000 expected by 2023) then the goal for new jobs would be 80,000. This is actually surpassed by the goal set for this update. The job target for *covered* employment is 84,000. However, the land use maps provides for nearly 110,000 jobs altogether. This would not only provide the jobs for all new residents, at your suggested ratio level. This would “make up” tens of thousands of the job deficit. The Chamber has lobbied for an abundance of employment lands. The County is eager to see the efforts of the Chamber, and other organizations, develop this land in an efficient manner, with many new job sites.

**#29, 5/5/03, from Steve Stuart (representing the Friends of Clark County FoCC) and Tim Trohimovich (representing 1000 Friends of Washington, 1KF),**

The following were suggestions for additional analysis. Given the tight timeframe and budget for this project, not all of these areas were able to be explored. However, continuing efforts will address some of these needs:

- 1) A comparison of county growth and density trends with the Metro region and other areas around the Northwest can be pursued as part of Clark County's coordination with METRO. This will occur as a result of the Bi-state land use accord, I-5 partnership, and Clark County's renewed commitment to the Metroscope planning process and model.  
Some of the most significant assumptions in the planning process were changed for the development of the Proposed Plan. Many of these came into better alignment with observed data.
- 2) A more detailed explanation of the importance of pervious surface on habitats can be found in the watershed specific studies undertaken as part of the County's ESA program and the Lower Columbia Salmon Recovery work. Your inclusion of bibliographical references is very helpful. By reprinting this in the FEIS, the information can hopefully be brought into the decision making process.
- 3) The GMA requires the avoidance of conversion of resource land to urban growth areas. It also encourages the conversion of lands already characterized by urban and near-urban development. These were considered during the development of the Proposed Plan. However, it is understood that certain planning goals are contradictory in nature. For example, the economic driver behind this boundary expansion has been portrayed as a need for specific types of land, especially large parcels. Many of the large parcels carry resource designations. We therein face the dilemma of what is to be done with large resource parcels near the UGA.  
Additionally, certain areas have been brought into the urban area because they are partially urbanized already. Yet, this results in a very low yield (of additional lots and vacant acreage), thereby necessitating additional lands be urbanized in order to accommodate the required 20 years of growth.

FOCC also included a list of criteria that would serve as a guide for evaluating the different alternatives. There was a very similar criteria list developed for this Plan Update. The list was revised based upon extensive public input that resulted from the public meetings in April and September of 2002. The criteria was also used to compare the previous alternatives before the GMA Steering Committee and with its Technical Advisory Committee. The criteria used were:

- 1) Minimize conversion of rural and resource land to urban
- 2) Provide most cost efficient delivery of public services
- 3) Minimize environmental impacts
- 4) Encourages economic development
- 5) Maximize transportation system and land use accessibility
- 6) Provide a variety of housing types
- 7) Includes areas that are characterized by urban development
- 8) Supports alternative transportation modes



**#30, 5/5/03 John Karpinski (representing the Clark County Natural Resource Council)**

1. The authors of the DEIS believe the methodology for calculating road improvement costs is accurate at the level required for non-project EISs and for comparison between alternatives, since the differences in magnitude of impacts can be seen. The costs of road projects was based on recent County experience with costs to construct a lane mile of roadway: \$1.9 million.

At the time the DEIS was prepared, revenue forecasts were incomplete. WAC 197-11-080 provides for situations where there are gaps in information. Agencies are required to state that information is not available, which was stated in the DEIS (line 18, p. 185). Agencies may proceed in the absence of information if the information is unknown and the costs of obtaining it are exorbitant. The DEIS did address financial impacts assuming a shortfall. The DEIS also addressed the more comprehensive list of projects and costs irrespective of deficits, but also identified other policy strategies that could respond to a shortfall. Unavoidable impacts remaining after proposed mitigation projects were discussed in the DEIS pp 184-188. The remand of the 1994 Plan resulted in the County Commissioners taking action to not show a shortfall in the current plan. The FEIS will be financially constrained. If there is a shortfall between the improvements needed in the preferred alternative and the existing revenue, a financing plan will be included to respond to the shortfall.

1b. Your letter does not state what particular element of the environment you expect would be affected, in terms of a “true environmental impact”, beyond the elements indicated in the DEIS. Impacts of the alternatives on air quality are addressed on pp 49-50 of the DEIS. The authors believe the impacts were adequately covered given the resources available. Impacts of the Proposed Alternative are addressed in the FEIS.

1c. The DEIS language referring to mitigation projects was intended to call out “key” mitigation projects, not all of them. The table of projects on pages 201-202 is the all-inclusive list of mitigation projects. The Capital Facilities Plan, for which costs were generated in the DEIS, includes the mitigation projects, other transportation improvements for circulation and bicycle/pedestrian access, and safety improvements beyond what is needed to mitigate for the change in land use. The FEIS will clarify this.

1d. This is a programmatic SEPA EIS, not a project nor a location-specific EIS. The location of the “alternative arterial system” would be addressed at project design or project planning stage. The costing of this “alternative arterial” was included in the overall transportation costs per alternative included in the DEIS, Table 89, p. 284.

1e. Transportation cost projections in the DEIS in Table 89 reflect projects for traffic circulation (collectors or “secondary arterials”) plus costs to correct future deficiencies, some of which currently exist. Updated cost tables for the FEIS will include line items for emergency repairs and major reconstruction that was not included in the DEIS.

1f. A complete project list was generated during analysis of the transportation impacts of the five alternatives. Total costs from that project list were used to generate the Table 89 costs. That list is available upon request. The full list for the Proposed Alternative will become the Capital Facilities Plan for the adopted Comprehensive Plan.

1g. There are several major projects included in the Table 89 costs that are included in all alternatives: replacement of the I-5 Columbia River Crossing, improvements to I-5 and I-205 identified in the Metropolitan Transportation Plan, improvements to SR-500, etc. While the difference between alternatives may be 25 percent, it is still \$600 million or \$30 million per year over the 20-year plan difference.

**1h. Mitigating the impacts of the land use alternatives on the transportation system requires funding from numerous sources. At the time the DEIS was prepared, revenue forecasts were incomplete. While the DEIS was not able to disclose a full capital assessment of the transportation system, this has been greatly improved upon in the FEIS. A project list, cost summaries, and road-fund revenues accompany the proposed plan studied in the FEIS. While the funding shortfalls that you predicted may be evident on the state system, such a catastrophe does not appear likely on the County road system.**

1i. The FEIS has disclosed the roadways that will experience higher rates of congestion with the adoption of the revised twenty-year land use plan. Some of these congested roadways will be improved in order to effectively manage the increased traffic. For other roadways, the Level of Service may have to fall. These lowered LOSs are also disclosed in the FEIS and air quality impacts qualitatively addressed. After the final land use map is adopted a full update of the County's concurrency ordinance and traffic impact fee system will be brought into compliance. These will define the new LOSs with greater precision.

1j. The DEIS intended to convey that reducing the UGA expansion or the intensity of growth would be a policy decision adopted concurrent with development of the Proposed Alternative, not consequent to it. The Proposed Alternative does put forward a smaller expansion area than three of the five alternatives in the DEIS.

1k. The costs of improving rural roads connecting urban areas has been included in the projected costs for transportation improvements. Adoption of the policy to convert rural connections to a higher standard. Stormwater and wetlands impact sections in the FEIS reflect the potential impacts and requirement for subsequent assessment under SEPA.

2. The No Action alternative is a required consideration under SEPA ( WAC 197-11-440(5)(b)(ii)). The purpose of the alternative section is to identify the "proposal" and "reasonable alternatives" which "shall include actions that could feasibly attain or approximate the proposal's objectives, but at a lower environmental cost or decreased level of environmental degradation". The No Action alternative can also serve the purpose of establishing a base line from which the consequence of the proposed action

and reasonable alternatives are to be measured. To achieve this objective, a No Action alternative for comprehensive plan analysis typically reflects the adopted comprehensive plan(s) and implementing regulations. Alternatives 1 and 3 provide a better range of analyses of potential options for accommodating growth by holding the current UGA boundaries (Alternative 3) or holding the current assumptions of the 1994 plan (Alternative 1). However, it should be noted that SEPA Rules do not define what a No Action alternative must look like, so lead agencies have some discretion in its design.

3. The total costs of road projects proposed as mitigation to maintain the level of service D is provided for each alternative beginning on p. 202. Table 55 on p. 201 contains a list of major corridor capital projects for each alternative to enable comparison of the most expensive project needs by alternative. Table 89 on p. 284 shows the costs of all projects under each alternative, although the list of specific projects that was used to create Table 89 was not included (but is available on request from Clark County Long Range Planning). A complete list of projects used to derive the total costs for the Proposed Alternative has been provided in the FEIS.

4. Your letter raises the issue of water supply versus water rights. Some wells could produce more water than is currently extracted, but water rights regulate the total amount that can be taken from each well. Water rights are critical in the sense that the process of acquiring them is lengthy and complicated and they are needed even for exploration for new water sources, as well for new permanent wells. In addition, finding aquifers that provide consistent long-term water output can be difficult. Identifying additional water sources is essential to serve the growing population. The existing conditions section notes this. Absent the information on total water availability, Table 72 of the DEIS compared the relative water demand that could occur under each alternative by residential, commercial, and industrial uses.

Conversations with water providers when the DEIS was being prepared revealed that supply is considered to be adequate to serve growth for approximately the next 10 years and that during that time, additional water sources will need to be found to support growth over the longer term. The absolute size of the aquifers and the total volumes of water they contain or can contain is currently unknown. The water levels in the aquifers are measured monthly at nine sites. The results provide data on how quickly groundwater is being recharged. Since the total potential supply is unknown, the recharge rate and how much water can be pumped daily from a well are the methods by which supply is monitored to meet the anticipated demand. Long range planning for water supply is therefore based on exploring new sites as potential wellheads and testing the maximum amount of water that can be pumped from them. In future, technology should be able to better determine the actual volume of the aquifers. The Vancouver Lake area has promising sources for new wells that are expected to be producing water for the county within 5 to 6 years.

Ideal design practice recommends that the source of supply be able to serve the maximum day demand (MDD) allowing stored water to be used for the daily peaking requirements of the system. For the City of Vancouver, for example, the total peak reliable well

capacity is 58 MGD. The peak day system demand in 2002 was 53 million gallons, or 261 gallons per person. If the average demand per person does not increase, the current water system will have sufficient capacity through 2013. However, to provide for uncertain growth patterns and for redundancy of supply, new water rights and water sources need to be acquired and brought on line by 2009 to handle growth beyond 2009.

The FEIS provides additional information on water supply under existing conditions in the Public Facilities section. The Coordinated Water System Plan, a county-wide planning document for water supply will be updated following adoption of the Proposed Alternative.

5. EISs are required to identify possible mitigation measures that will reduce or eliminate the adverse environmental impacts of a proposal. The FEIS identifies the intended environmental benefits of the development regulations for critical areas (WAC 197-11-440(6)(c)(iv)). See also the response to Kemper on the SEPA requirements vis-à-vis mitigation, comment letter #11, response #3.

Your observations about the current limitations of environmental protection ordinances are well taken. The Wetland Protection Ordinance works well mechanically for major developments (i.e. land divisions and site plan reviews), but is not as strong for new construction on residential lots. The Wetland Protection Ordinance technical standards have not been substantially reviewed in approximately 12 years and may not be consistent with Best Available Science. Shoreline projects are reviewed for consistency with the Shoreline Management Master Program and Shoreline Management Act but both of those are also not likely to be consistent with BAS. Shoreline regulations rely upon effective wetland, floodplain, habitat, grading and other regulations to be effective. The Habitat Conservation Ordinance does a fairly good job deciphering between avoidable and unavoidable impacts, and tailoring development to appropriate levels in critical areas. However, discretion is primarily left to those interpreting the intent of the code as to what activities are avoidable. Furthermore, certain exempt activities may still generate a significant impact, yet no mitigation measures are codified that could soften the project effects. These limitations are called out specifically in the FEIS.

The GMA requirement for ordinances to apply BAS in critical areas will result in updates to those ordinances. The updated regulations are subject to review by DOE, which adds another layer of review to ensure that regulations are sufficiently effective to achieve their intent. Once the ordinances have adopted BAS, they should be as effective as they can be given current data. In addition, site-specific impacts are subject to additional environmental review under SEPA, where additional opportunities for mitigation are available. SEPA Rules permit reliance on ordinances for mitigation.

6. Table 35 (p. 112) could have shown the same average density but did not, which was an oversight. While Table 1, Summary of Alternatives contains the information in the bottom row under Alternative 1, it is easily missed: "Average density of 8 homes per acre, compared with about 7.5 in other alternatives." The densities for comparison purposes are shown in the table below. While the authors attempted to make comparisons

as directly as possible, some data were more problematic to present that way. One example was the Alternative 3A analysis in the Transportation section, which has been modified to allow comparison between 3A and the other alternatives in the revised DEIS (PDF only).

1994 Plan	Actual	Proposed Alternative	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
8.0	6.0	7.1	8.0	7.44	7.32	7.44	7.44

7. Mitigation is defined in WAC 197-11-768 as avoiding, minimizing, rectifying/repairing, reducing, eliminating, compensating, or monitoring environmental impacts. EISs are required to identify possible mitigation measures that will reduce or eliminate the adverse environmental impacts of a proposal. Mitigation is required to address the range of impacts revealed in the EIS, which the DEIS did, and the level of analysis of impacts should match the level of mitigation proposed. At the comprehensive plan level, citing ordinances that have been adopted or are proposed for adoption are appropriate mitigation measures and SEPA allows reliance on ordinances as mitigation. Unavoidable adverse impacts, which are included in the impacts sections for the elements of the environment, in some cases imply or in others explicitly state that ordinances cannot be expected to fully mitigate impacts.

Your specific reference to WAC 197-11-440(6)(c)(iii) and (iv) does not reveal the wording that a key measure of any EIS mitigation scheme is how effective the mitigation is. It is understood that there is an underlying assumption of some level of effectiveness of mitigation in order for it to be accepted as mitigation by decision-makers. Uncertainty and effectiveness of mitigation are suggested topics to be included in the EIS Summary (WAC 197-11-440(4)) and this has been added more explicitly to the FEIS Summary section.

8. You comment that the DEIS suggests as a mitigation measure that the UGA be reduced “after the County finds out some X years into the Plan...”. This is an incorrect interpretation of that section. A reduced UGA was suggested as a measure to reduce impacts as part of the process of developing or selecting a Proposed Alternative, not following adoption and implementation of a Proposed Alternative. Regarding a lowered level of service standard, please see response to #1i, above. Safety and job production are not elements of the environment that are required to be evaluated under SEPA.

9. Urban holding zoning is suggested mitigation on p. 135 of the DEIS. Urban holding zoning is also proposed to be implemented as part of the Proposed Alternative. Your suggestions for specific regulatory mechanisms, like increased buffer sizes, limits on impervious surfaces, and greater requirements for tree plantings have been added as Suggested Mitigation in the FEIS. See response to Kemper, comment #3, regarding requirements to determine the effectiveness of mitigation measures.

10. Unavoidable adverse impacts were discussed in the impacts sections of elements of the environment where they potentially may occur. They have also been evaluated in the FEIS, and called out in a separate section of the Summary.

11. The effectiveness of 1994 planning is demonstrated by current jobs-to-population ratio shown on page 4. The County is purposefully pursuing greater job development than experienced in the 1994-2003 planning period.

12. Infrastructure ratios for developing alternative growth scenarios were adopted by the BOCC. The 38 percent ratio derives from the current adopted comprehensive plan and is one way to examine different growth scenarios. The Proposed Alternative uses 27.5 percent (residential) and 25 percent (industrial and commercial), close to observed experience.

13. It is not clear on what basis your request for identical assumptions is made. The BOCC provided direction for the alternatives to include a variety of densities. The EIS is required to provide a range of options; it is not required to be identical in specific aspects of those options.

14. Mitigation based on “no net loss” of industrial land is discussed in the DEIS on page 161. Policies in Chapter 9, Economic Development Element, of the County’s revised comprehensive plan restrict the conversion of industrial land to non-industrial and would apply as mitigation for all alternatives.

15. County policies under 9.3 of the County’s revised comprehensive plan protect industrial land inventory. The information you suggest for inclusion in the DEIS would not be necessary as the amount of industrial land would essentially stay the same under current rezoning regulations for all alternatives.

16. See response to comment #13.

17. We are unclear as to your reference to “Plant Manual”. Page 9 is the summary section and would not catalog other bird species. Clark County does not track neo-tropical migrant bird species. Threatened and Endangered species are noted. One of the reasons for general habitat retention and protection (by Critical Areas Ordinances) is to protect neo-tropical migrant bird species.

18. Alternative 3 does not have a “higher plan for residential capacity”. The table shows that Alternative 3 has adequate capacity to accommodate expected growth (future growth will use 87 percent of it, leaving excess capacity of 13 percent).

19. See responses above to comment on transportation costs.

20. & 21. Your comments are noted, but a specific critique of the methodology or basis for questioning the numbers is required before a response can be made. The authors stand behind the estimates provided.

22. Revenue estimates for road projects by alternative were not available for the DEIS. Revenues compared to estimated costs for the Proposed Alternative are provided in the FEIS.

23. See response to comment #7.

24. The road improvements required for a parallel arterial system are provided in the complete project list in the FEIS.

25. Considerable analysis on sewer capacity at build out was conducted as part of the concurrent Focused Public Investment Plan and contributed to the analysis in the DEIS. The sanitary sewer providers did not foresee constraints such as those you mention impacting their ability to provide service for the population growth that is projected under the alternatives. NPDES permits are updated every five years. If regulatory changes result in changes that are needed to the systems' treatment processes, those would need to be made as part of the periodic update and costs would be recouped by future systems development charges.

26. & 27. See response to comment #4. Information on water availability is provided in the FEIS, water existing conditions section. Water withdrawal data is available in the Coordinated Water System Plan on the public record at Clark County.

28. & 29. Mitigation (Table 3, p. 13) refers to ordinances that “restrict *development*” [italics added] where there are soil limitations, not “restrict all elements”. Typically geotechnical studies are required to determine the limitations and what measures are needed to avoid geologically hazardous areas (areas with susceptibility to erosion, sliding, earthquake or other geological events that are not suited to development consistent with public health or safety concerns [RCW 36.701.030 (9)]).

30. Reducing congestion and promoting public transportation have been added to the table in the amended DEIS. The relationship between traffic congestion and air quality is appropriately discussed in the air quality section in the DEIS beginning on p. 49.

31. Your comment is noted. Updating County and cities' CAOs to meet BAS standards is ongoing.

32. See response to comment #17.

33. See response to comment #31.

34. Page 13 of the DEIS is a summary of mitigation measures. It is unclear how your comment on including noise from PDX International Airport fits within this table.

35. Table 3 of the DEIS states that “Federal and state regulations that limit noise exposure...provide for some mitigation of noise impacts.” It is assumed that if noise impacts exceed state thresholds, the impacts must be mitigated.

36. See responses to comments on transportation improvements, above.

37. Alternative 3 represents an alternative to expanding the UGAs.

38. Your comment on unresolved remand issues is noted. The County is still working on the 3500 acre remand and the agricultural exemption remands from the 1994 planning process.

39. & 40. See responses to comment #12 and #13.

41. Different assumptions were used to generate different growth scenarios as part of the analysis of alternatives required under SEPA. These were policy decisions made by the BOCC and are not inconsistent GMA. GMA requires consistency and evaluation of consistency of the adopted plan. Consistency of the Proposed Alternative with GMA is shown in the FEIS.

42. See response to Kemper, comment #11, response #3, and Karpinski response #1.

43. Your comment is noted. Septic system construction is regulated. Watering of lawns is not currently regulated.

44. Your comment is noted. Clearing activities are often regulated through erosion control or clearing ordinances, compliance with which (in the case of Clark County), is a requirement of the CAO.

45. You suggest “additional development regulations”, which are described under the “Additional Mitigation” section in the DEIS, p. 45. Open space designation is proposed for 25 % slopes on page 45. Clearing is typically already regulated. Mitigation of potential drainage impacts from development on steep slopes are suggested as additional mitigation on p. 45.

46. If “definitive air quality monitoring” is meant to suggest computer modeling of impacts under each alternative, the cost to do so would be prohibitive, as it would require information for inputs that is not currently available. Furthermore, it is not necessary for evaluation of alternatives. Vehicular emissions are the major cause of air pollution and relative amounts of congested lane miles and vehicles miles traveled—combined with conversion of rural, relatively vegetated areas acting as carbon sinks to urban, developed uses—can be a proxy for air quality impacts at a planning level of analysis.

47. Your comment is noted. The impacts of non-attainment on industrial expansion have been added to the DEIS under general impacts.

48. Impacts have been added to the general impacts discussion on p. 56 of the DEIS.

49. Suggested mitigation has been added to Suggested Mitigation in the FEIS.



50. Assessing the effectiveness of ordinances as mitigation is not required. SEPA allows reliance on ordinances as mitigation. All the cities and the County are in the process or planning to update their environmental ordinances to incorporate BAS by December 2004 and will be much more effective as a result. See response to Kemper, comment letter #11, response #3, and Karpinski, response #7, above.

51. Your suggested mitigation measure has been added to the general mitigation discussion for groundwater, habitat, and wetlands.

52. The DEIS cites the intent of the ordinance as stated in the text of the ordinance; it does not evaluate whether the purpose of the ordinance is met by the regulation nor is it required to do so.

53. Assessing the effectiveness of ordinances as mitigation is not required. SEPA allows reliance on ordinances as mitigation. See response to Kemper, comment letter #11, response #3, and Karpinski, response #7, above.

54. Assessing the effectiveness of ordinances as mitigation is not required. SEPA allows reliance on ordinances as mitigation. See response to Kemper, comment letter #11, response #3, and Karpinski, response #7, above.

55. Your comment is noted. Salmon habitat protection and recovery is currently being addressed regionally by the Salmon Recovery Planning effort. Clark County and its cities are participants. Projected additional impervious surface impacts on a watershed basis were provided in the DEIS as a way to indirectly assess potential impacts on fish-bearing streams.

56. This statement is misleading and has been revised. Alternative 3 presumes the same intensity of development and protections within existing UGAs as the other alternatives.

57. General habitat protection through existing and proposed regulations is intended to protect neo-tropical migrant bird species.

58. See response to comment #56.

59. & 60. Assessing the effectiveness of ordinances as mitigation is not required. SEPA allows reliance on ordinances as mitigation. See response to Kemper, comment letter #11, response #3, and Karpinski, response #7, above. DOE reviews the CAOs and may also evaluate whether the regulations are sufficiently effective to meet the objectives of GMA.

61. Airport noise is discussed in existing conditions, p. 97 of the DEIS. Airport noise mitigation from is regulated by federal and state standards. Additional mitigation could include evaluating noise impacts on Vancouver residents. However, most of the potential impacts from noise at airports would likely be on development within existing UGAs.

The UGA expansion areas are some distance from existing airports. Therefore, the potential impacts were not considered strictly relevant to an analysis of the alternatives for UGA expansions.

62. Your comment is noted. The Proposed Alternative includes an assumption of 2.69 persons per household.

63. Land absorption is discussed on p. 111. More information is available in the Plan Monitoring Report, as cited in the References section.

64. Your comment is noted.

65. Your comment is noted. Information to determine growth densities (existing and projected population) is provided in the DEIS.

66. See response to comment #12 and #13.

67. Assessing the effectiveness of ordinances as mitigation is not required. SEPA allows reliance on ordinances as mitigation. See response to Kemper, comment letter #11, response #3, and Karpinski, response #7, above.

68. Your comment is noted. The impact of road congestion is alluded to in the last sentence but could be made more explicit. The DEIS has been amended to address this comment.

69. See response to comment #13. The Proposed Alternative uses 20 employees per acre, which is appropriate given that most of industrial land proposed for inclusion in UGA has an actual density of 20.

70. See response to comment #14.

71. See response to comment #56.

72. See response to transportation comments above.

73. School commutes for the most part occur during non-peak times, except for morning high school commutes. The more significant impact on school transportation is not as much congestion as it is the area to be served. It is expected that as the urban growth areas expand and population growth occurs, that additional schools will be built to minimize the impact of congestion on school bus transportation times. SEPA does not require nonproject DEISs to examine all conceivable impacts, policies or implementation measures but should cover a range of topics (see also response to #1, above, re: WAC 197-11-442).

74. Copies of Figures 41 and 42 can be obtained from Clark County Long Range Planning.

75. Many of the locations were included in improvement projects contained in the project list to support Table 89. Some stand-alone safety projects were also in that list. The list is clarified for the FEIS.

76. Costs to add sworn officers to meet growth in population and area is not necessary for a comparison of impacts; it is implied by the number of officers required, based on the level of service standards adopted by the agencies. With respect to providing “extrapolated crime rates”, Clark County Sheriff data on calls-for-service has been added to the amended DEIS instead. Forecasting crime rates, calls for service, and jail population all have at least high positive correlations with population levels. (Higher populations means more offenders, and more victims, more victims means more calls for service, and more offenders means higher jail populations) Expected changes in population have similar changes in the three variables. UCR statistics are not a good way to help decide “crime levels”. UCRs are the only way currently that law enforcement has to help present crime levels to the public, and taken at a glance are fine, but for any sort of planning are statistically unsound. The major reason is that they do not capture all crimes. Fraud, and identity theft, the fastest growing crimes in America, are not captured for example.

77. More dispersed and less dense residential development creates longer commutes for school transportation. Therefore, the more significant impact on school transportation is the area to be served. It is expected that as the urban growth areas expand and population growth occurs, that additional schools will be built to minimize the impact of congestion on school bus transportation times. A general statement reflecting your comment has been added to the discussion of impacts in the FEIS. In addition, more information on school capacities and impacts from the alternatives was provided by the Schools Consortium and has been added to both the amended DEIS and the FEIS.

78. Your comment appears to be referencing the deficit in developed park acres (415 acres) for urban parks. The total urban park inventory (1068 acres) does not reflect a deficit. The text simply states the deficit, as in other sections of the EIS.

79. A paragraph on the nature and typical types of maintenance reductions has been added to the amended DEIS.

80. Information on the costs and funding for park acquisitions has been added to the text of the amended DEIS.

81. A paragraph discussing the impacts of parks deficits in general has been added to the text of the amended DEIS.

82. Sewage plant capacity and use is discussed on pp. 232-237. See Karpinski response #25, above.

83. See Karpinski response #25, above. CPU does not have authority to impose a moratorium on sewer on the City for sewer hookups, although new connections to the La Center Waste Water Treatment Plant have been temporarily halted until the new treatment plant is operational (expected in November 2003). Additional information from La Center on future treatment capacity has been added to the amended DEIS.

84. The DEIS states: “Septic systems are the primary method of sewage disposal in the *suburban* and rural areas of the county. They are also still used within the *urban service areas of the county and within some cities’ municipal limits.*” (Italics added.)

85. The general impacts of failing septic systems on public health and the environment has been disclosed in the amended DEIS.

86. See response to comment #4.

87. See response to #48.

88. The EIS is required to disclose impacts and mitigation. The alternatives are based on differences in land uses and geographic expansions of the UGAs. Therefore, consistency with annexation, UGA expansion, transportation, and concurrency policies were addressed. General mitigation for policy inconsistencies would be to redo the inconsistent plan, policies or regulations. This was stated in the DEIS, p. 286. Jurisdictions were given an opportunity to disclose how their individual plans are consistent with GMA in the GMA conformance tables. However, the DEIS is not required to force compliance of the jurisdictions; that is a GMA, not a SEPA issue.

89. Without specific references as to how the comments on one section of the DEIS apply to other sections, specific responses are not possible.

**#31, 05/05/2003, from LeAnne Bremer (Miller Nash LLP) representing Frank Kanekoa, (2002-037)**

In your letter you request to change parcel 141320-000 from Forest Resource II (FR-40) to Rural (R-5). As per the year 2001, direction provided by the Board of County Commissioners- the Plan Update does not specifically undertake amendments to rural designations unless they are to be included in the Urban Growth Area. In addition, the Board of Commissioners has changed the assumed rural household allocation from 19% to 10% confirming that additional capacity in the rural area is unneeded. However, the Board changed the growth rate assumption from 1.5% to 1.83% for the proposed comprehensive plan update, which requires additional rural lands adjacent and very near the existing Urban Growth Area to be included in the expanded Urban Growth Area.

**#32, 05/05/2003, from LeAnne Bremer LeAnne Bremer (Miller Nash LLP) representing McDonald Living Trust (2002-045) , Response to be generated by LRP**  
In your letter you request to change parcel 129825-000 from Agriculture (AG-20) to Rural (R-5).

As per the year 2001, direction provided by the Board of County Commissioners- the Comprehensive Plan Update does not specifically undertake amendments to rural designations unless they are to be included in the Urban Growth Area. Parcel 129825-000 is north and outside of the City of Washougal's existing Urban Growth Area. The City of Washougal will not be expanding its Urban Growth Area during this Comprehensive Plan Update. Furthermore, the assumed allocation of 19% new housing to the rural area has been changed to 10% new housing in the rural area reducing the expected capacity in the rural area.

**#33, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Pacific Rock Products (2003-027) , Response to be generated by LRP**

Your letter requests for parcels 125831-000, 125839-000, 126669-000, 126758-000, and 126941-000 to be changed from a rural designation of Industrial Urban Reserve (UR-20) to an urban designation of Light Manufacturing (ML) on the Comprehensive Plan Update Map. The Proposed Comprehensive Plan Map includes these parcels in the Urban Growth Area, but designates these parcels as Business Park. The Business Park designation is assumed to support development that would generate a greater number of family wage jobs per acre than the Light Manufacturing (ML) designation would yield. Since, generating employment lands is a key goal for the comprehensive plan update the proposed expansion to the Urban Growth Area includes more Business Park land then Light Manufacturing.

**#34, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Mike Bowyer (2002-007), Response to be generated by LRP**

Your letter requests to change parcels 198088-000 and 198089-000 from Rural (R-5) to Community Commercial (C-3) on the Comprehensive Plan Update Map. The Proposed Comprehensive Plan Map includes these parcels as Industrial Urban Reserve. The purpose of the Industrial Urban Reserve designation is to protect land on the fringe of the Urban Growth Boundary from premature land division and development that would preclude efficient transition to large scale industrial or business park development (CCC18.305.010B). Since, generating employment lands is a key goal for the future of Clark County's economy and that these parcels are located in an area of larger parcels along a major highway (SR503) the updated plan proposes that parcels 198088-000 and 198089-000 be designated Industrial Urban Reserve.



**#35, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Rosemary Parker (2002-052), Response to be generated by LRP**

In your letter you request to change parcels 200329-000 and 200369-000 from Rural (R-10) to Urban Residential. The proposed comprehensive plan map includes these two parcels in the new urban growth area and designates the parcels as Business Park. The County's primary goal within this Comprehensive Plan Update is to encourage family wage employment. Therefore, many land parcels were identified for business-park, office campus, and light manufacturing uses.

**#36, 05/05/2003, from Stephen W. Horenstein (Miller Nash LLP) representing Harriet Jenkins (2003-017A), Response to be generated by LRP**

In your letter you request to change parcel 119860-000 from Urban Reserve (UR-10) to an urban designation. The proposed comprehensive plan map includes this parcel in the new urban growth area as Urban Residential.

**# 37, 05/05/2003, from Chuck McDonald (representing Hazel Dell Sewer District)**

Thank you for the comments and corrections on behalf of the Hazel Dell Sewer District. They have been noted. The accuracy of the FEIS has benefited from your input. County staff looks forward to a future of cooperative growth management with your organization.

**#38, 05/05/2003, from Marnie Allen (representing the Consortium of Clark County School Districts)**

Table 62 in the amended DEIS reflects the amended Table 62 you provided.

Table 64a on impacts at build-out has been added to the amended DEIS with your narrative on how the figures were calculated.

Table 65a, additional students, was added to the amended DEIS with explanatory text provided by you.

The two paragraphs on school district boundaries were added, but the figures were not. Your tables 65d, 65e, and 65f were included in the FEIS discussion on schools. These tables provide very useful information for considering the comparative ability of schools districts to accommodate growth. However, there is no simple metric with which to judge the fiscal impacts to school districts. For example, Hockinson can be seen in the tables to have very low commercial and industrial land development. This could be understood to severely limit the ability of the Hockinson School District to fund necessary programs. To the contrary, the tables will also reflect that the total assessed value per pupil in Hockinson is the third highest in the County.

Text in the DEIS on p. 222 was amended to reflect your suggestions. Suggested new policy has been included in the FEIS under “Suggested Mitigation Measures”. In addition, the analysis of the impacts on school districts under each alternative was revised to reflect the data provided by you.

**#39, 05/05/2003, from Scot Walstra (representing Responsible Growth Forum)**

Please consider the following responses to your letter of comment. You will see that many of your issues are deeply appreciated by the Board of County Commissioners and the staff. Your letter recommended the use of a 1.83% growth rate. This is, in fact, the growth rate used for the proposed land use map calculations. This issue is further explored in the preceding position statement. Your recommended emphasis on job growth is also an inextricable part of the current plan update. You recommended that we plan for 92,500 new jobs. The initial target for the proposed plan was 84,000. The map, as we are modeling it, accommodates over 100,000. Not only are there land provision assumptions being used to facilitate job growth, a number of supporting concepts are also being implemented. These include focused public investment planning, express permitting for job centers and more. Your request for a reconsideration of redevelopment assumptions has also been considered. The assumptions that regulate the amounts of land have been the matter of great debate. The proposed plan which was melded from the alternatives has many changed assumptions from 1994. It may also be possible that the vacant land model assumptions be more broadly reconsidered after adoption of the plan. It may not be as likely that staff will be able to assist with your fourth request, a thorough analysis of the revenues versus expenditures of residential, commercial, and industrial development. As you well know, such studies are very resource consumptive. It has not yet been the position of the Board of County Commissioners that taxpayers dollars would be well-spent on such an academic exercise. Though the nature of “who pays for growth” is a popular topic of study, the numerous reports on the subject have collectively been unable to resolve the debate. However, your request that the transportation analysis be complete with new level of service settings will be undertaken as a part of the Plan update.

You had also made some comments specific to industrial and commercial development. The comments related directly to assumptions and methodology will be recorded for reference when the vacant land model is next updated. There may be little support for reducing the estimates of job yield from tertiary industrial lands without binding environmental constraints. In fact, the Plan Monitoring Report found that these lands were being absorbed at a higher percentage than other industrial lands. Please refer to the position statement on the Discovery Corridor for more information on that point.

Lastly, the Responsible Growth Forum land use map proposal has been reviewed. It is also helpful when members of the public bring site specific information to bear on such a large project. However, the proposal provided over 300% of the land necessary for the planning period. As this is inconsistent with County policy and the State Growth Management Act, you will not see the proposed plan urbanizing such a large proportion of the County.

**#40, 05/04/2003, from Ed Pickering (representing himself)**

Thank you for your comments. Mixed use and some commercial zoning oriented to 119<sup>th</sup> St. are proposed. Please refer to the position paper on job creation in the FEIS document. Acquired park land is north of and outside of the proposed boundary expansion area on the east side of NE 72<sup>nd</sup> Avenue and therefore is not necessary to serve as a buffer between new proposed land uses.

**#41, 05/05/2003 Dale Miller (representing C-TRAN)**

1. Table 3-20 of the MTP includes quantifiable performance measures for transit. These have been used to evaluate the Proposed Alternative in the FEIS. The percentage of population within one-fourth mile of fixed route transit service was obtained from RTC as it is a parameter in their modeling. The information has been added to the amended DEIS (PDF version only).
2. The DEIS has been revised as suggested (PDF only).
3. The amended DEIS reflects your comments on transit services and the land use-transit connection.
4. Your comments are noted. The amended DEIS reflects C-TRAN as a 4<sup>th</sup> type of facility in the MTP. County transit services were discussed in detail under the “setting” for transit section, p. 176-177 of the DEIS.
5. The DEIS has been revised as suggested (PDF only).
6. Funding of planned roadway improvements for the Proposed Alternative is discussed in the FEIS. Air quality impacts are discussed on p. 51, line 16 and line 30 of the DEIS.
7. The amended DEIS has been revised as suggested (PDF only).
8. The DEIS has been revised as suggested (PDF only).
9. Your comments are noted. The FEIS includes suggested language.
10. Your comments are noted. The impact of lowered levels of service on transit was addressed in the impacts section for Roads and Highways beginning on p. 184 of the DEIS. Your suggestion for preferences for transit service in congested corridors has been added under Suggested Mitigation in the FEIS.
11. The amended DEIS has been revised as suggested (PDF only).
12. Information on Planned and Funded Transit Improvements from the latest Transit Development Plan for C-TRAN has been included in the FEIS.
13. Your suggested language has been added to the amended DEIS and included in the FEIS.
14. Information on the gross numbers of transit riders by alternative is available from the RTC modeling summaries and has been added to Table 53 in the amended DEIS and summary in the FEIS.
15. Table 54 in the amended DEIS shows which are transit corridors.

16., 17., 18., 19. 20., and 21. Suggested revisions were added to the amended DEIS (PDF only).

22. The impacts analysis in the DEIS discusses the impact of congestion on transit. It is also recognized that congestion on the Portland-bound transit service would also impact the ability to attract transit ridership and provide adequate transit level of service. This has been recognized in the FEIS along with reporting of gross transit riders in the summary table.

23. Your comments are noted. Other strategies as you suggest have been added to the amended DEIS.

24., 25., 26. Suggested revisions were added to the amended DEIS (PDF only).

27. The DEIS analysis for Alternative 3 assumed that with a higher amount of population and employment within the current Vancouver UGA, there would be additional corridors that may sustain transit service. To provide this service, additional service hours and miles would be required.

28. Your comment is noted.

29. Alternative 3a was run at the specific request of the City of Vancouver to test the impact of light rail, and a light rail land use distribution, on the Clark County transportation system. To be fair, all comparisons were made for the 20-year horizon (2023), with no interim-year analysis undertaken. It is recognized that a phasing plan would be necessary to get to LRT/HCT but not necessarily discussed in a comprehensive plan DEIS.

30. The amended DEIS has been changed to 15,000 households.

31. While Alternative 3, 3A and the Focused Public Investment Areas (FPIAs) did not assume any change of zoning—just full build out at existing zoning and Section 215 report densities and intensities—coordination of access and service by C-TRAN would have to occur as a part of the subarea planning for the priority FPIAs. Likewise, any planning to extend LRT to Clark County would include coordination with C-TRAN service. The City of Vancouver would support locating LRT on Fourth Plain Blvd, rather than SR 500 and the Fourth Plain corridor between I-5 and I-205 has been identified as an urban activity center in the draft Vancouver Comprehensive Plan. The City will also be undertaking subarea planning of identified urban centers as a step in implementing the comprehensive plan. This effort would be coordinated with C-TRAN and the I-5 Trade and Transportation Partnership effort.

32. Your comments are noted and have been incorporated into the amended DEIS.



33. By incorporating your comments, the amended DEIS has disclosed potential impacts as far as they are known or expected. No other discussion other than that suggested by your letter has therefore been included.

34. This change has been made in the amended DEIS.

35. The congested transit corridors can be listed as for the other alternatives and have been added to the DEIS.

36. Accessibility is defined as you have described in the amended DEIS. In addition, the layout of many current business centers does not encourage walking to/from transit.

37. Suggested language has been added to the amended DEIS.

38. The amended DEIS has been updated to reflect your comments.

39. Your comment is noted. Similar language is shown in the DEIS on lines 4-6.

40. and 41. Your comments are noted. The Impacts section contains a similar discussion.

42. TDM strategies are described under “Transportation Management” on p. 175. We believe that any of the alternatives would benefit by deploying TDM strategies. TDM is also described in the mitigation section for the alternatives.

43. The FEIS discussion on policy compliance with regional transportation facilities will include transit as well as evaluation and performance measures similar to the MTP.

44. Your comment that TDM should be in all of the alternatives is noted and reference has been made in the FEIS.

45. Transit LOS and performance measures have been included in the FEIS.

46. Your comments are noted and have been incorporated into the amended DEIS.

47. As your letter notes, dispersal of employment centers to many locations—where transit service and corridors are unlikely to develop to serve the dispersed sites and where development standards do not include a transit-oriented development requirement or incentives—would not result in increased transit usage. That is true for Alternatives 2, 4, and 5. Alternative 2 adds residential areas contiguous to current UGBs, but most of the areas are not along or within walking distance of transit routes and therefore would not serve to increase transit mode share, which is reflected in the low transit mode share as reported in the DEIS. Alternative 4 is similar except it provides outlying employment centers, as in Alternative 2 they are not accessible to or from transit and thus the mode share is low. Alternative 5 provides new employment centers along the I-5 corridor, which could be near or adjacent to future park-and-rides or transit centers along the I-5 corridor. If TOD standards are applied, these could result in “reverse commute” trips

along the I-5 corridor which would actually serve to increase transit mode share but also benefit C-TRAN by having revenue-paying passengers in both directions on I-5 commute routes. Nevertheless, this alternative, along with Alternatives 2 and 4, would require new transit service to serve these new centers.

48. The authors of the DEIS attempted to keep the analysis qualitative in nature, as the C-TRAN 20-year plan process would analyze this in more quantitative detail. However, it is a potential impact to a transportation provider, and thus should be reported under SEPA requirements. The amended DEIS reflects your comments.

49. Language reflecting your comment has been added to the amended DEIS.

50. Language reflecting your comment has been added to the amended DEIS.

51. Again, the authors expect the C-TRAN 20-year plan process to answer this question quantitatively. However, as a disclosure document, the DEIS needs to call out potential financial impacts to C-TRAN under these alternatives.

52. Your comment is noted and is reflected in the FEIS.

53. While this is true in the context of federal Congestion Mitigation and Air Quality funding, there is still competition among federal STP and other local, state, and federal funding sources between road, transit, carpool/vanpool, and bike/pedestrian projects. Focusing on road improvements to mitigate for significant congestion/LOS problems will very likely reduce the amount of funding (except for CMAQ) available for carpool/vanpool programs.

54. Your comment is noted and is reflected in the FEIS.

55. The FEIS will attempt to use as much financial and cost information from C-TRAN's 20-year TDP process as is possible to evaluate the Proposed Alternative. Capital cost information for transit is currently in the DEIS (park-and-rides), but could be expanded in the FEIS to include other transit capital costs such as new buses to serve increased service areas, new maintenance facilities, etc.

**#42, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing The Church of Christ at 800 N. Andresen,**

The proposed designation change at the Church of Christ property at 800 N. Andresen is was previously submitted for consideration to the City of Vancouver, and is addressed on page \_ of this document, along with other site specific designation change proposals in Vancouver.

**#43, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Taison Chang Group (McCleerey) at NE 99<sup>th</sup> Street, Response to be generated by LRP**

Your letter requests the change of parcel 145787-000 from Urban High R-43 to Community Commercial C-3. The Proposed Comprehensive Plan Map does not specifically undertake amendments to parcel designations within the existing Urban Growth Area. Furthermore, the property sets within the middle of a larger area of parcels designated and zoned Urban High R-43, which makes it an unlikely parcel for changing the designation and zone within the process of this Comprehensive Plan Update.

**#44, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at 119<sup>th</sup> St., Response to be generated by LRP**  
In your letter you request the change of parcel number 198579-000 from Agriculture (AG-20) to 14 acres of Community Commercial (C-3) and 49 acres of Light Manufacturing (ML). The proposed comprehensive plan map includes this parcel into the Urban Growth Area, but designates the eastern portion of the parcel as Mixed Use and the western portion of the parcel as Commercial.

**#45, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Redinger (new name and added parcels) , Response to be generated by LRP**

In your letter you request the change of parcel numbers 115621-190, 115621-192, 153934-000, 153934-005, 153934-010, 154006-000, 154020-000 and 608402-000 from Agriculture (AG-20) to Urban Low (R1-6). The proposed Comprehensive Plan map does not include these parcels in the expansion of the Urban Growth Area.

**#46, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Frasier Property, Response to be generated by LRP**

In your letter you request to change parcel numbers 199631-000 and 199839-000 from Agriculture AG-20 to Urban Low R1-7.5. The proposed comprehensive plan map includes these parcels into the proposed Urban Growth Area with a Mixed Use designation. The Mixed Use designation implements Clark County goals and policies encouraging land use patterns and individual developments that integrate a variety of uses to reduce sprawl, promote pedestrian and transit use, limit the need for automobile trips and to foster neighborhood and community identity.

**#47, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Germann Property (8924 NE Ward Rd) , Response to be generated by LRP**

In your letter you request to change parcel number 154032-000 from Urban Reserve UR-10 to Urban Low R1-6. The proposed comprehensive plan map does not include these parcels into the proposed Urban Growth Area.



**#48, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing DeFrees, Response to be generated by LRP**

In your letter you request to change parcel 235645-000 from Agriculture AG-20 to Urban Reserve UR-10. As per the year 2001, direction provided by the Board of County Commissioners- the Comprehensive Plan Update does not specifically undertake amendments to rural designations unless they are to be included in the Urban Growth Area. The proposed Comprehensive Plan Map does not identify new Urban Reserve properties.

**#49, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Somarakis at NE 107<sup>th</sup>, Response to be generated by LRP**  
In your letter you request to change parcel number 199874-000 from Agriculture AG-20 to Urban Low R1-7.5. The proposed comprehensive plan map includes this parcel into the proposed Urban Growth Area with a Mixed Use designation.

**#50, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at NE Ward RD 88<sup>th</sup> Street, Response to be generated by LRP**

In your letter you request to change parcel numbers 104150-000, 104164-000, and 104165-000 from Urban Low R1-6 to Community Commercial C-3. . The Proposed Comprehensive Plan Map does not specifically undertake amendments to parcel designations within the existing Urban Growth Area. The Buildable Lands Report shows that additional commercial land is not needed within the Urban Growth Area.

**#51, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Gramor at NE 117<sup>th</sup> Ave, Response to be generated by LRP**

In your letter you request to change parcel numbers 155110-000 and 155119-000 from Light Manufacturing (ML) to General Commercial (CG). The Proposed Comprehensive Plan Map does not specifically undertake amendments to parcel designations within the existing Urban Growth Area. The Buildable Lands Report shows that additional commercial land is not needed within the Urban Growth Area. County goals and policies support and encourage family-wage employment. Therefore it is essential for the county to preserve those lands zoned (ML) and to identify additional lands capable of supporting industrial development that generates family-wage employment.

**#52, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Defrees, Response to be generated by LRP**

In your letter you request to change parcel number 200081-000 from Agriculture AG with an Urban Reserve overlay to Urban Low R1-6. The Proposed Comprehensive Plan Map includes this parcel into the Urban Growth Area with a Business Park designation.

**#53, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Hinton Development , NE 174<sup>th</sup> Street, Response to be generated by LRP**

In your letter you request to change parcel number 181675-000 from Urban Reserve UR-10 to Urban Low R1-6. The proposed Comprehensive Plan Map does not include this parcel in the Urban Growth Area.

**#54, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing 4DHM Properties and Dietrich, Response to be generated by LRP**

In your letter you request to change parcel numbers 199614-000 and 199623-005 from Agriculture AG-20 to Urban Low R1-6. The proposed Comprehensive Plan Map includes these parcels in the Urban Growth Area with a designation of Mixed Use. The Mixed Use designation implements Clark County goals and policies encouraging land use patterns and individual developments that integrate a variety of uses to reduce sprawl, promote pedestrian and transit use, limit the need for automobile trips and to foster neighborhood and community identity.

**#55, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Smokey, Jones, Johnson, and Hurley, Response to be generated by LRP**

In your letter you request to change parcel numbers 104180-000, 104282-000 and 153933-000 from Agriculture AG-20 to Urban Low R1-6. The proposed Comprehensive Plan Map does not include these parcels in the Urban Growth Area.



**#56, 05/05/2003, from Randall Printz (Landerholm, Memovich, Lansverk & Whitesides) representing Hatch, Response to be generated by LRP**

In your letter you request to change parcel number 117160-000 from Urban Reserve UR-10 to Community Commercial C-3. The proposed Comprehensive Plan Map includes this parcel in the Urban Growth Area with a Mixed Use designation. The Mixed Use designation implements Clark County goals and policies encouraging land use patterns and individual developments that integrate a variety of uses to reduce sprawl, promote pedestrian and transit use, limit the need for automobile trips and to foster neighborhood and community identity.

**#57, 05/05/2003, Matt Lewis (representing the Building Industry Association of Southwest Washington)**

Your staff has very thoroughly kept abreast of the update process and the methodologies of various studies. Your input on these important details benefits the update process. The first point raised in your comments was about the growth rate and population projections. In general, please see the position statement on the growth rate. You are correct that the population total of 486,000 was confusing in the DEIS. This number was kept static from the beginning of the process, even though new base population data and new census information had become available. These numbers have all been revised, and you will see that the population level being planned for is now substantially higher.

Your request for a reconsideration of redevelopment assumptions has also been considered. The assumptions that regulate the amounts of land have been the matter of great debate. The proposed plan which was melded from the alternatives has many changed assumptions from 1994. It may also be possible that the vacant land model assumptions be more broadly reconsidered after adoption of the plan. Keep in mind that the vacant lands model is just one tool used in the planning process. You did specifically request a reduction in the planned percentage of growth allocated to the rural area. Your assertion of 11% is very close to the 10% split used in the proposed plan.

Your request for more information on projected revenues is provided in this FEIS. Additionally, the County has a full report on the revenue methodology. This is a part of the public record and can be reviewed by your organization at your leisure. The assumptions therein have remained somewhat constant from the previous revenue perspective which has been available on the County website.

**#58, 5/5/03, from Carl Dugger (representing the Washington Department of Fish and Wildlife)**

Please refer to the position statement on the Growth Rate.

The FEIS discusses the irretrievable loss of habitat associated with urbanization. The position statement on the environment speaks to this issue. It will also be addressed in the coming update of the critical areas ordinances.

It is certainly true that the increased urbanization is preventable with higher densities. In 2001, the Board of County Commissioners addressed the density goals to be used in the planning process. In order to provide greater flexibility between each City's Urban Growth Area's the Board lowered the density goals by approximately 13% County wide. This results in an increased need for urban land.

**#59, 05\05\2003, from Eric Hovey on behalf of Scot Walstra (representing Responsible Growth Forum)**

Same as comment #39

**#60, 05/05/2003, from James, Howsley (Lane Powell Spears Lubersky) representing Robert Kaleta, (2003-018A) , Response to be generated by LRP**

In your letter you request to change parcels 96621-103, 96621-102, 96621-100, and 96621-116 from Community Commercial (C-3) to Community Commercial (CL). The Proposed Comprehensive Plan Map does not specifically undertake amendments to parcel zones within the existing Urban Growth Area.

**#61, 05/05/2003, from James, Howsley (Lane Powell Spears Lubersky) representing Jochim Property and Holt Homes Developer, (2003-016AA), Response to be generated by LRP**

In your letter you request to change parcel 181223-000 from Urban Reserve (UR-10) to Urban Low (R1-6). The proposed Comprehensive Plan Map includes this parcel within the Urban Growth Area with a Mixed Use designation. The Mixed Use designation implements Clark County goals and policies encouraging land use patterns and individual developments that integrate a variety of uses to reduce sprawl, promote pedestrian and transit use, limit the need for automobile trips and to foster neighborhood and community identity.

**#62, 05/04/ 2003, from Charles Parsons, (2003-062), Response to be generated by LRP**

In your letter you request to change parcels 196164-000 and 196351-000 from Urban Reserve (UR-10) to Urban Low (R1-7.5). The proposed Comprehensive Plan Map does not include these parcels in the Urban Growth Area.

**#63 05/05/2003 Martin L. Snell (representing the City of Camas)**

The City states that it generally supports Alternative 4 and its policy assumptions (75%/25% housing split limit; 6 units per acre residential density). The Proposed Comprehensive Plan Map is consistent with the City's proposals as reflected in Alternative 4 plus the agreement between the cities of Camas and Vancouver regarding the Fisher Basin areas.

The City's letter notes that Alternative 5 illustrates a 40-50 year growth vision, but needs additional east county employment and transportation corridors. The Proposed Comprehensive Plan Map includes significant areas for additional east county employment and does not include many of the large expansion areas for employment along the I-5 corridor that were in Alternative 5. Please refer to discussion under the position statement on the Discovery Corridor above.



**#64, 05\05\2003, from Bart Phillips (representing Columbia River Economic Development Council)**

Please refer to the preceding position statement on the Discovery Corridor.

**#65 05/05/2003 Martin L. Snell (representing the City of Camas)**

The follow up letter from the City of Camas notes your support for responsible growth, strategic economic development and community livability. Your position is that Alternatives 1, 3 & 5 do not represent responsible growth, because it is unrealistic to think that no UGB expansion or a huge expansion area is needed. Expansion should be prudent in size, scope, fiscal impact and natural resource impact. The Proposed Comprehensive Plan Map reflects the City's proposal for expansion of the Camas UGA. The fiscal impact and natural resource impact are addressed in this Final EIS document.

The letter notes that the addition of large areas will not in itself provide economic development. Staff agrees. Current economic development activities include a new Economic Development strategy which addresses the actions necessary to stimulate economic development.

Your letter states the City's position that expansion areas must be served by cost-effective capital facilities and that cities and the County should invest in areas with a strong sense of community and economic vitality. The capital facilities plan will include a financially constrained system of improvements the County intends to complete in order to assure that adequate public facilities are available to serve expansion areas. This analysis will be informed by the Focused Public Investment Plan data.

Your letter states the City's position that urban reserves should be used to prevent premature parcelization. The Proposed Comprehensive Plan Map includes 3,981 acres of existing Urban Reserve-10, 1,202 acres of existing Urban Reserve-20 and 560 acres of additional Industrial Urban Reserve. Your letter states the City's position that the Plan should reflect a balancing of GMA goals. Staff believes that the analysis in the Final EIS demonstrates that the Proposed Comprehensive Plan Map balances the GMA goals, regional growth projections and the general growth patterns proposed by the cities.

The Proposed Comprehensive Plan Map generally corresponds with the map submitted for Camas UGA expansion and the resolution that was reached with Vancouver on overlapping Fisher Swale corridor expansion area requests. The Board of County Commissioners declined to include the residential portion of the Green Mountain Resort in the Proposed Comprehensive Plan Map. **[Can / must we explain why?]**

**#66 05/05/2003; amended 05/14/2003 from Monty K. Anderson (representing City of Washougal)**

The City supports a compact urban form best represented in Alternatives 3 & 4. The Proposed Comprehensive Plan Map reflects the City's planning objectives in that it does not expand the Washougal Urban Growth Area boundary. Your letter notes that recent amendments to the City's Comprehensive Plan increased residential capacity to 7,806 new residents. Based on the County's analysis, the residential capacity may be greater if a 5% redevelopment factor and 5% development on critical lands is assumed. Your letter expressed a desire to work with the County on a 144 acre industrial reserve designation in the northwest corner of the city. This area has been designated Industrial Urban Reserve on the Proposed Comprehensive Plan Map.

**#67, 05/05/2003, from Doug Ballou (representing the Neighborhood Associations Council of Clark County)**

The proposed plan is a modified version of Alternatives 2 and 4. The proposed Comprehensive Plan map has been reviewed and a zoning map is proposed and available for review. New zones and implementing ordinances have been prepared for Mixed Use (MX), Business Park and Office Campus, all of which include some design standards. Future work for the county may include revised commercial design guidelines, if such guidelines or standards are at the direction of the Board.

We look forward to active participation from the neighborhood associations.

**#68, 05/02/2003 George Vartanian (representing himself)**

1. Your comments on the alternatives are noted.
2. Table 2 in the DEIS (Summary of Impacts) already includes costs for sewer, water, and transportation, although does not aggregate the total costs in one row. The FEIS will include a row in Table 2: Summary of Impacts for total costs to include sewer, water, and transportation costs.
3. Your comment is noted.

**4. The calculation for determining the amount of land is the same method the County used to determine the net acres needed for development. The explanation of how the calculations were made on page 33 of the DEIS is inaccurate and has been corrected in the FEIS to reflect the methodology actually used. The County calculated land added by the market factor differently than shown above. The market factor is a gross acreage added to the total acres needed. Using the same numbers as the example above, the County determined the additional land needed to meet the market factor in the following manner:**

- 1.33 gross acres (net acres plus infrastructure) x .50 market factor = 0.67 gross acres
- 0.67 gross acres + 1.33 gross acres = 2.0 gross acres needed.

This assumes that 50 percent more land would be added for residential development. This is consistent with the calculations used in the DEIS.

5. Generalized land use categories were used to determine the potential impacts under each alternative; light and heavy industrial uses, as with commercial uses etc., were not broken into separate categories for this analysis, although when a preferred alternative is chosen, future zoning designations would designate specific land uses and development densities. An assumed jobs per acre was also identified for each land use type.

6. Alternatives 1, 2, 4 and 5 assumed the same number of jobs per acre for industrial and retail uses as the 1994 Plan. The 1994 Plan did not include an office/business park category. All alternatives assumed 20 jobs per acre for this new land use category. Alternative 3 assumed job densities already achieved in Clark County rather than those designated in the 1994 Plan.

7. This is a comment on the comprehensive plan rather than the DEIS. Your comments on the importance of neighborhood livability are noted. Policies under Goals 10.2 and 10.3 of the Community Design Element address livability issues.

8. Your comment is noted. The DEIS on pp 147-148 discusses the County's economic development strategies that are less based on the concept of high-tech businesses and more on knowledge-based industries instead, not all of which could be labeled cyclical. Targeted industry clusters include expansion of locally owned businesses and retention of existing businesses, as well as the life sciences and health care industries (in addition to high-tech businesses). Business Park additions to UGAs in the Preferred Alternative will

allow a range of uses that are intended to provide family-wage jobs. Refer to CCC Chapter 18.315 Business Park District for a list of allowed uses and development standards.

9. See response to comment #8.

10. Your comment is noted. A goal of GMA and Clark County is efficient use of land.

11. & 12. Your comments refer to mitigating implementation measures that are already generally in place. Refer to CCC Chapter 18.315 Business Park District for a list of allowed uses and development standards for those industrial areas to be added to UGAs. For example, 18.315.055 requires a 75-foot setback from residential zones. Heavy industrial uses typically are classified by level of impact and are located in Port of Vancouver, and Columbia Shores areas and away from residential areas.

13. Your comment is noted.

14. Comments in support of FOCC alternative are noted.

15. Staff have revised the Business Park district in conjunction with the comprehensive plan update. If your concern is with the preservation of the industrial land supply, staff directs you to the policies in Chapter 9, Economic Development Element of the County's revised comprehensive plan, which restrict the conversion of industrial land to non-industrial. Mitigation based on "no net loss" of industrial land is discussed in the DEIS on page 161.

Items 2 through 4 are the same as comments 11 through 13 and are addressed above. Item 5 recommends making rezoning more difficult. The criteria for zone changes are found in CCC 18.503.060 and are considered to be sufficient. The code needs to be sufficiently flexible to allow for zone changes when they are appropriate to make zones consistent with comp plan designations and when circumstances would make it beneficial for the county. Item 6 requests a better definition of Mixed Use Development.

**#69, 04/29/2003, from Brent A. Grening (representing the Port of Ridgefield)**

For a summary of the County's current perspective on the Discovery Corridor, please refer to the preceding position statement. In addition to the points made in the position statement, your comments warrant an additional response. With certain reservations, you had supported Alternative 5. Many aspects of this alternative are also built into the proposed plan. As Ridgefield had requested, no large urban growth boundary expansion was provided to in Ridgefield. However urban reserves are currently being considered as a means to preplan for the La Center and Ridgefield junctions. These urban reserves could be interpreted as a means of recognizing future implementation of the north section of the Discovery Corridor concept. You had also proposed sub-area planning of the Interstate area. This may be an activity that the Board of County Commissioners will support in the coming years.

**#71, Received 05/09/2003 (undated memo), from Bridget Schwarz (representing Fairgrounds Neighborhood Association)**

Please refer to the position papers on job creation in the FEIS document to address your comments on economic development.

Zoning has been applied to the proposed Plan map. Staff has done field work and viewed a majority of the sites proposed for inclusion in the UGAs. As a means of managing growth and development, the proposed expansion areas for the urban growth areas are proposed to be put into Urban Holding designation at least until such time as either annexation, sub-area planning or adequate services become available. The Board of Commissioners will make a decision on this with adoption of the Comprehensive Plan.

We look forward to active participation from the affected neighborhood associations.